



Invested in You

**Form ADV Part 2A**

**Brochure Cover Page**

**Koss Olinger Consulting, LLC**

SEC File No. 801-58175

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Koss Olinger Consulting, LLC (referred to as "Adviser" or "Koss Olinger") is a registered\* investment advisory firm under the Investment Adviser's Act of 1940.

March 31, 2022

This brochure provides information about the qualifications and business practices of Koss Olinger Consulting, LLC.

If you have any questions about the contents of this brochure, please contact us at [eddiem@kossolinger.com](mailto:eddiem@kossolinger.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

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

*\* Registration with the SEC does not in any way constitute an endorsement by the SEC of an investment adviser's skill or expertise. Further, registration does not imply or guarantee that a registered adviser has achieved a certain level of skill, competency, sophistication, expertise or training in providing advisory services to its clients.*

## ITEM 2 MATERIAL CHANGES

This Brochure dated March 31, 2022 has been prepared according to SEC rules and requirements. This section discusses only material changes made since the last amendment and filing of this Brochure with the SEC on March 30, 2021.

Since the last amendment and filing of this Brochure on March 30, 2021, the following material changes have been made:

- Effective March 1, 2022, Eduardo J. Mordujovich, J.D., assumed the position of Chief Compliance Officer (CCO) of Koss Olinger.
- In accordance with the Department of Labor's recently adopted Prohibited Transaction Exemption 2020-02, Improving Investment Advice for Workers & Retirees, we added language to **Item 4 – Advisory Business** acknowledging that Koss Olinger is acting as a fiduciary when we provide investment advice to you regarding your retirement plan account or individual retirement account.

Pursuant to those rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year which is December 31<sup>st</sup>. We will provide other ongoing disclosure information about material changes as necessary. We will also provide you with a new Brochure, as necessary, based on changes or new information. Currently, our Brochure may be requested at any time, without charge, by contacting Eduardo J. Mordujovich at (352) 373-3337 or via email at [eddiem@kossolinger.com](mailto:eddiem@kossolinger.com) or on the SEC's web site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using a unique identifying number, known as a Central Registration Depository, or CRD, number. The CRD number for Koss Olinger Consulting, LLC is 111855. The SEC's web site also provides information about any persons affiliated with Koss Olinger Consulting, LLC who are registered, or are required to be registered, as investment adviser representatives.

**Table of Contents****TABLE OF CONTENTS****ADV Part 2A Brochure**

ITEM 1 Brochure Cover Page	1
ITEM 2 Changes for Part 2A	2
ITEM 3 Table of Contents	3
ITEM 4 Advisory Business	4
ITEM 5 Fees and Compensation	7
ITEM 6 Performance-Based Fees and Side by Side Management	10
ITEM 7 Types of Clients	10
ITEM 8 Methods of Analysis, Investment Strategies and Risk of Loss	10
ITEM 9 Disciplinary Information	11
ITEM 10 Other Financial Industry Activities and Affiliations	11
ITEM 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	12
ITEM 12 Brokerage Practices	13
ITEM 13 Review of Accounts	16
ITEM 14 Client Referrals and Other Compensation	16
ITEM 15 Custody	16
ITEM 16 Investment Discretion	17
ITEM 17 Voting Client Securities	17
ITEM 18 Financial Information	17
Privacy Policy	16

**ADV Part 2B Supplemental**

William David Olinger, III	19
Kirk Edward Klein	23
William David Olinger, II	28
William Frederick Koss	33
William James Rossi, III	38
Brian Earl Watson	44
Timothy Alderson Roark	45
Shannon Louise Reintgen	53
Mitchell Hawkes Hay	57
Benjamin Arda Doty	56
Brittney Drew Olinger	59

## ITEM 4 ADVISORY BUSINESS

Koss Olinger Consulting, LLC (referred to as “Adviser” or “Koss Olinger”) is a registered\* investment advisory firm under the Investment Advisers Act of 1940.

*\* Registration with the SEC does not in any way constitute an endorsement by the SEC of an investment adviser’s skill or expertise. Further, registration does not imply or guarantee that a registered adviser has achieved a certain level of skill, competency, sophistication, expertise or training in providing advisory services to its clients.*

Koss Olinger Financial Group was established in 1969 as a privately owned, independent financial planning company to provide personal and professional wealth management services to individuals, families and businesses. In 2009, Koss Olinger Financial Group became two separate entities - Koss Olinger and Company, LLC and Koss Olinger Consulting, LLC. In September 2009, Koss Olinger Consulting, LLC was organized as a Limited Liability Company under the laws of the State of Florida. In September 2016, William D. Olinger III, Kirk E. Klein, William J. Rossi III and Brian E. Watson purchased 36% in member units (9% each) from founding members, William D. Olinger II (18%) and William F. Koss (18%). The resulting ownership percentages of both entities are William D. Olinger III (29%), Kirk E. Klein (29%), William J. Rossi III (21%) and Brian E. Watson (21%). William D. Olinger II and William F. Koss remain involved as consultants. Together these six individuals have over 150 years of financial advisory experience.

The Advisory services that Koss Olinger offers includes management of investment advisory accounts, investment supervisory services, investment advice through consultations, financial planning and, often, furnishing advice to clients on matters not involving securities. Koss Olinger’s investment advisory services are offered as a percentage of assets under management and fixed fees (not including subscription fees). Koss Olinger’s client base includes individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and corporations or other business entities. Koss Olinger offers a range of investment advice on various types of investments including equity securities (exchange-listed securities and securities traded over-the-counter), certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual fund shares), United States government issued securities, and options contracts on securities. Koss Olinger also offers investment advice on interests in partnerships in real estate, oil and gas interests, real estate investment trusts (REITS), and possibly CMOs (collateralized mortgage options).

In June 2019, as a part of a broader rulemaking package known as “Reg BI,” the SEC issued an interpretation clarifying its views of the fiduciary duty that investment advisers owe to their clients under the Advisers Act. The interpretation expounded on the duty of care and duty of loyalty components of that fiduciary duty, concluding that the obligation to act in the best interest of the client is the “overarching principle” encompassing both components of the investment adviser’s fiduciary duty. See, Commission Interpretation Regarding Standard of Conduct for Investment Advisers, Exchange Act Release No. IA-5248 (June 5, 2019) (“the Fiduciary Release”). Serving the best interests of our clients and ensuring that we never subordinate our clients’ interests to our own have been chief guiding principles for Koss Olinger since our foundation. We have always recognized the fiduciary relationship with our clients, and its attendant responsibilities, throughout all our advisory services and continue to do so in light of the contours of that duty as reaffirmed through the June 2019 Fiduciary Release.

The investment strategies used to implement investment advice given to clients include long term purchases (securities held at least a year), short term purchases, trading (securities sold within 30 days), short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

Koss Olinger provides a client-centered planning process that allows the Adviser to tailor the advisory services to the individual needs of the clients. The process takes clients through The Wealth Navigator System™.

**ITEM 4 ADVISORY BUSINESS (CONTINUED)****The Wealth Navigator System™****Engagement and Discovery™**

The first step of the planning process is Engagement and Discovery™. The Adviser gathers as much pertinent information as possible through client meetings, questionnaires, etc., building a foundation on which the Adviser can begin to create a financial game plan unique to the client. The Adviser discusses the client's current financial situation, their goals, objectives and available resources.

**The Critical Factors Analysis™**

The second step of the planning process is The Critical Factors Analysis™. Using the information from the discovery process, the Adviser analyzes the client's current financial strengths and weaknesses, as well as the financial opportunities available to the client. This step involves combining the client's personal information and the Adviser's wisdom, experience, and creativity to allow the Adviser to further shape and develop the client's unique financial game plan.

**The Breakthrough Game Plan™**

The Breakthrough Game Plan™ is the next step in the planning process. The Breakthrough Game Plan is a comprehensive strategy customized for the client that may include retirement planning, estate planning, tax planning, business planning, risk management and asset management. The Adviser educates the client on the various options available in the marketplace that may be needed to implement the client's game plan. The Adviser explains the client's options in an objective, unbiased manner and the Adviser provides their recommendations.

Utilizing The Legacy Optimizer™ ("LO™"), The Secure Retirement Maximizer™ ("SRM™") and The Optimized Portfolio Solution™ ("TOPS™") as tools, the Adviser can identify, evaluate, analyze and develop a customized financial plan.

**The Implementation Solution™**

Once the client is presented The Breakthrough Game Plan™, the Adviser will guide the client through the strategies they want to implement based on the client's unique financial situation, goals and available resources. The Adviser will execute the client's game plan at the request of the client.

**The Wealth Manager™**

Koss Olinger will provide ongoing advice and management of the client's Breakthrough Game Plan™. The Adviser will provide proactive, objective advice to ensure the client's goals are successfully accomplished should the client's situation, goals or objectives change.

Koss Olinger provides continuous and regular supervisory and management services to securities portfolios. The assets we have under management and number of accounts associated with those, as of December 31, 2021, are as follows:

Account Description	U S Dollar Amount	No. Accounts
Discretionary	\$1,252,127,164	2,162
Non-Discretionary	\$189,714,118	532
Total Assets Under Management	\$1,441,841,282	2,694

## ITEM 4 ADVISORY BUSINESS (CONTINUED)

### Acknowledgment of Fiduciary Status Under ERISA

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”) and/or the Internal Revenue Code (the “Code”), as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

When providing recommendations to retirement plan accounts involving rollover considerations, there are generally four options regarding an existing retirement plan account. An employee may use a combination of those options, such as: (i) leave the funds in the former employer’s plan, if permitted; (ii) roll over the funds to a new employer’s plan, if one is available and rollovers are permitted; (iii) roll over to an Individual Retirement Account (“IRA”); or (iv) cash out the account value (which could, depending upon the individual’s age, result in adverse tax consequences). If we recommend that you rollover your retirement plan assets into an account to be managed by us, such recommendation creates a conflict of interest insofar as we will earn an advisory fee on the rolled over assets. You are under no obligation to roll over retirement plan assets to an account managed by us.

### Third Party Money Managers

We may determine that opening an account with a professional, independent investment manager (“Third Party Money Manager”) is in your best interest. We primarily use Valmark Advisers, Inc. (“Valmark”) when recommending a Third Party Money Manager for your accounts. Some of our advisers and principals are also registered representatives of Valmark Securities and/or Valmark Advisers as detailed in Item 10 of this Brochure.

The Third Party Money Managers selected under these programs will have discretion to determine the securities they buy and sell within the account, subject to reasonable restrictions imposed by you. Due to the nature of these programs, each of the independent money managers is obligated to provide you with a separate advisory contract and disclosure document. You should carefully review these documents for important and specific program details, including pricing.

Under these programs, we may assist in the identification of investment objectives; recommend specific investment style and asset allocation strategies; assist in the selection of appropriate money managers; review performance and progress; recommend reallocation among managers or styles within the program; and recommend the hiring and firing of money managers utilized by you.

You should read the ADV Part 2 disclosure document of the Third Party Money Manager you select for complete details on the charges and fees you will incur. Please reference Item 12 below for details on fees and compensation issues with respect to our recommendation of Valmark.

## ITEM 5 FEES AND COMPENSATION

### Consulting Fees

The consulting, or planning, fees are based on the complexity of the client's needs and are established at the time of signing the Financial Advisory Agreement. Consulting fees are negotiable. The fee will be paid when the Financial Advisory Agreement is signed. In no case will Koss Olinger collect fees of \$1,200 or more for any financial plan that is expected to exceed six months until completion.

### Investment Advisory Account Fees: Private Client Accounts

The Adviser provides a managed account program to its clients referred to as "Private Client Accounts" or "PCA." In most circumstances, the fee charged to clients covers the fee for investment advisory services, as well as commissions for brokerage execution.

"Unsolicited trades" (i.e., those trades requested by the client) will be charged applicable commissions and/or transaction fees. Trades solicited by Koss Olinger will, most often, have either no transaction/commission charged or Koss Olinger will reduce the advisory account fee by the amount of transaction/commissions charged to the client by the custodian for the account, Charles Schwab & Co., Inc. ("Schwab"). The majority of trades solicited by Koss Olinger will be for mutual funds, which have no transaction charge or commission imposed by Schwab. Koss Olinger does not share in any transaction fees or commissions charged or earned by Schwab.

Our fee calculation encompasses all assets in the client's advisory account unless specifically excluded. Accordingly, our fee calculation can include cash balances in money market funds, short-term investment funds, ETFs, mutual funds, the full market value of margined assets and short positions, alternative investments, and all other investment holdings. At times, especially during low-yield environments, our fee will exceed the money market yield.

When a client utilizes margin in their portfolio, we include the full margin balance in the billable market value of the client's account. Therefore, the corresponding fee payable by the client will increase if there is a margin balance at the time that fees are calculated. As a result, in addition to understanding and assuming the additional principal risks associated with use of margin, clients authorizing margin are advised of the conflict of interest whereby the use of margin will also increase the fee payable to us.

Fees will be billed quarterly in advance based on the market value of the client's account on the last day of the previous quarter. The initial fee under the fee schedule is calculated from the date of inception to the end of the initial calendar quarter under the terms of the client agreement. Fees will be pro-rated with respect to amounts added to or withdrawn from accounts during each quarter. The amount of the Adviser's fees will be transmitted to the Custodian, from which the Custodian will debit the client's custodial account.

**ITEM 5 FEES AND COMPENSATION (CONTINUED)**

Fees to Koss Olinger are as follows:

Market Value of Client Asset	Annual Fee
\$1 to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.90%
\$2,000,001 to \$3,000,000	0.80%
\$3,000,001 to \$4,000,000	0.70%
\$4,000,001 to \$5,000,000	0.60%
\$5,000,001 to \$7,500,000	0.50%
\$7,500,001 to \$10,000,000	0.45%
\$10,000,001 to \$20,000,000	0.40%
\$20,000,000 or \$50,000,000	0.35%
\$50,000,001 to \$100,000,000	0.30%
Over \$100,000,000	0.25%

The client will receive a statement showing the amount of the fee and the value of the client's assets on which the fee was based. The client is responsible for verifying the accuracy of the fee calculation, as the client's custodian will not determine whether the fee was properly calculated. Fees may be negotiated or waived under certain circumstances. For instance, related accounts (i.e. households or family relationships) can be consolidated for valuation of assets to determine the fees to be charged.

For custodians whose fees cannot be automatically deducted, a statement will be sent to the client that reflects the value of account assets and the fee amount due to the Adviser.

**Third Party Money Manager Fees**

In exchange for services provided by a Third Party Money Manager and the account custodian, each client agrees to pay annually a set percentage of the total assets held in the client's account. Further explanation regarding the fees associated with any Third Party Money Manager is provided in the Investment Advisory Agreement that each client signs before participating in any Third Party Money Manager program.

Advisory fees are generally collected from the client's account quarterly, in advance, and are based upon the aggregate market value of the assets in the client's Third Party Money Manager account at the close of business on the last business day of the preceding calendar quarter. The advisory fee charged to the client by the Third Party Money Manager and/or the IAR contracted to offer their advisory services will not exceed these established percentages:

Avg. Account Balance	Total Annual Fee May Not Exceed
\$50,000 to \$1,000,000	2.15%
\$1,000,001 to \$2,000,000	1.75%
\$2,000,001 and above	1.50%

The total advisory fee includes compensation for both the Third Party Money Manager and Koss Olinger and may be lower than the total fees specified above. The specific breakdown of these fees will be outlined on the advisory agreement pertaining to each account. The client will not pay additional trading costs associated with purchasing and/or selling securities. Trading fees will be paid by the Third Party Money Manager. Client should refer to the Third Party Money Manager's Wrap Fee Program Disclosure to see the program fees payable as well as other account opening and servicing details. Valmark Advisers, Inc. ("Valmark") will not prorate or reimburse quarterly fees paid in advance if a client terminates their Third Party Money Manager advisory agreement after five days of the account's initial funding or after the first 10 calendar days of any subsequent quarter. Comparable services may be available elsewhere for a lower fee.



**ITEM 5 FEES AND COMPENSATION (CONTINUED)****Other Fees and Expenses**

Advisory fees charged are separate and distinct from the fees and expenses charged by mutual funds, which may be recommended to clients. Clients may incur certain charges imposed by third parties other than the Adviser. A description of these and other expenses are available in each fund's prospectus. The Adviser will not be compensated on the basis of a share of capital gains or on capital appreciation of the funds or any portion of the funds of the client.

The client may choose to use the programs individually or in combination. They are not restricted to only financial planning, for example. All fees may be negotiable at the sole discretion of the Adviser. The client or the Adviser may cancel the Agreement at any time with 10 days written notice to the other. In the event that the client wishes to cancel the Agreement prior to any services being performed, any advance payments shall be fully refunded. If the client cancels the Agreement after the Adviser has begun the services requested, the client shall be charged for the services completed and the remainder of any advance payments, if any, shall be refunded to the client within 30 days of the written request. If additional payment is due Adviser (time spent exceeds the deposit), an invoice shall be presented to the client and will be due upon receipt. Should the client terminate the Agreement within five business days after signing, no charges or penalties will be assessed. The client will be responsible for any fees or charges incurred by the client from third parties as a result of maintaining the account or for any securities transactions executed.

Should outside consultants be required in areas of special concern or expertise, their fee and/or time charge will be in addition to Koss Olinger's fee. All information and advice furnished by either to the other, including their agents and employees, shall be treated as confidential and not disclosed to third parties except as agreed upon in writing or required by law.

A client may invest in some mutual funds directly without the services of the Adviser. In that case, the client would not receive the services provided by the Adviser, which are designed, among other things, to assist the client in determining which investment management programs and money managers are most appropriate to the client's financial situation and objectives. The client should review both the fees charged by the funds and the fees charged by the Adviser and the other investment advisers chosen to fully understand the total amount of fees to be paid by the client. Only then will the client be able to fully evaluate the advisory services being provided and the fees being paid. In addition, the client may pay fees for custodial services, account maintenance, transaction fees and other fees associated with maintaining an account. Adviser does not share in any portion of such fees.

The client will receive a statement at least quarterly from the custodian of their account, detailing all transactions and fees deducted from the account for that calendar quarter.

**Additional Compensation for the Sale of Securities and Insurance Products**

Associated persons of the Adviser, when acting as registered representative of Valmark Securities, Inc., a FINRA registered broker-dealer ("Valmark"), will receive commissions-based compensation through the purchase and sale of securities to clients of the Adviser. The compensation earned by these persons in their capacities as registered representatives is separate from and in addition to our advisory fees. This presents a conflict of interest in that associated persons of the Adviser have an incentive to recommend securities products for the purpose of generating commissions rather than solely based on client needs. Commission rates can be found at other broker-dealers that are higher or lower than those charged at Valmark. Clients are under no obligation, contractually or otherwise, to purchase securities products through any person affiliated with our firm.

Additionally, certain associated persons of the Adviser will receive commissions-based compensation for the sale of insurance products through Executive Insurance Agency, Inc., a general insurance agency ("Executive Insurance Agency"). Insurance commissions earned by these persons are separate and in addition to our advisory

fees. This presents a conflict of interest in that associated persons of the Adviser have an incentive to recommend insurance products for the purpose of generating commissions rather than solely based on client needs. Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Koss Olinger has no proprietary affiliations with any investment or insurance companies. The Adviser gives independent financial advice and makes investment recommendations for the client based on client goals, objectives, risk tolerances and needs. There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

Whether receiving compensation in the form of advisory fees for investment advisory services or as separate commissions for the sale of securities and insurance products, Koss Olinger acts as a fiduciary and, as such, makes recommendations that are in the best interest of our clients. Koss Olinger has policies and procedures in place which are designed to address our fiduciary and regulatory obligations under the Advisers Act, including our obligation to act in the best interest of our clients when making investment recommendations. We conduct reviews from time to time to ensure that the Adviser and its supervised persons are adhering to our policies and procedures, including our Code of Ethics policy (see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading, below), and providing investment advice in the best interests of our clients and according to the clients' objectives.

## ITEM 6 PERFORMANCE-BASED FEES

Koss Olinger does not accept performance-based fees, that is, fees based on a share of capital gains on, or capital appreciation of, the client's assets.

## ITEM 7 TYPES OF CLIENTS

The Advisory services that we offer include management of investment advisory accounts, investment supervisory services, investment advice through consultations, financial planning and, often, furnishing advice to clients on matters not involving securities.

Our client base includes individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and corporations or business entities not already mentioned.

The new Koss Olinger Private Client should have a minimum of \$2,000,000 in investable assets and/or \$5 million in net worth. However, the minimum may be waived for existing client relationships, employees and their relatives. There is no minimum account size for financial planning clients.

A client is expected to complete and sign various documents to establish an account. Some of the documents that a client would expect to complete and sign are the Risk Return Optimizer questionnaires, new account forms, a Financial Advisory Agreement and/or Private Client Account Agreement(s) and an Investment Portfolio Summary ("IPS").

## ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

The Adviser evaluates clients' investments to ascertain that the fundamental features are synchronized with the clients' financial objectives. A proposed portfolio is designed to help the client attain future financial security and the investments in the portfolio are stated in generic terms (for example, "growth stocks" and "municipal bonds").

The methods of analysis, investment strategies and any material risks in formulating our investment advice or managing assets are as follows:

1. Fundamental Method: For stocks, we use valuation ratios such as Price to Earnings ("P/E"), Price to Book ("P/B"), Shiller P/E (10 year-smoothed earnings), profit margins, and growth forecasts for each nation ("GDP").

These measures allow us to evaluate whether the market is expensive or cheap relative to historical valuations. This also gives a good idea of the risk-reward available for each security/asset class. Other valuation components are Return of Equity (“ROE”), Return of Assets (“ROA”), projected growth, free cash flow, and Debt to Equity Ratio (“D/E”). However, there are still risks with this strategy and investing in securities involves a risk of loss that you should be prepared to bear. For bonds, ratios such as Debt Service Coverage, spreads to risk-free securities such as comparable maturity Treasuries, credit ratings and duration measures are used to ascertain risk-reward available for each security/asset class.

**Material Risk:** This strategy still has risk as the market can be irrational from time to time. Outside or unforeseen events can cause a loss of principal. The main types of risk that are present are market risk (entire stock market falls out of favor and declines as a whole) and interest rate risk (sudden increases in interest rates may cause the value of principal to decrease). Through proper diversification some specific business risk can be mitigated as holding an individual stock exposes you to the risks specifically of that one company. Total portfolio measures, such as Beta, absolute returns, Sharpe Ratios and upside/downside capture ratios are also used to establish parameters for market risk.

2. **Technical:** 200-day, 50-day simple and exponential moving averages help display overbought or oversold conditions relative to the current price. We use this for specific asset classes to make tactical recommendations for our annual portfolio construction. However, there are still risks in this strategy and investing in securities involves a risk of loss that you should be prepared to bear.

**Material Risk:** This strategy is useful for getting an overall idea as to where the market/security came from (its past pathway to the current price). One main risk with this strategy is that alone, it can be very dangerous to use as a primary tool because trend following can often lead to sharp losses of principal.

3. **Other:** The Adviser evaluates clients’ investments to ascertain that the fundamental features are synchronized with the clients’ financial objectives. A proposed portfolio is designed to help the client attain future financial security, and the investments in the portfolio are stated in generic terms (for example, “large growth stocks” and “municipal bonds”). Even though the adviser obtains information that is deemed to be accurate by the client, there are still risks in this strategy and investing in securities involves a risk of loss that you should be prepared to bear.

**Material Risk:** The risk of this strategy is mainly miscommunication. The adviser communicates with the client in order to get the best idea as to their level of risk tolerance and what types of securities they prefer to invest in.

Additional risk may be present if the client fails to disclose any outside assets or information that may hinder the adviser’s ability to make a sound decision.

The main securities recommended are mutual funds, closed end funds, ETFs, bonds, and stocks. Their risk components are as follows:

- a. Mutual funds: market risk, manager risk
- b. Closed End Funds: market risk, manager risk, liquidity risk (some trade at discounts for prolonged periods of time)
- c. ETFs: market risk
- d. Bonds: interest rate risk, reinvestment risk, liquidity risk, default risk
- e. Stocks: company risk (specific), market risk

## ITEM 9 DISCIPLINARY INFORMATION

Koss Olinger is required to disclose all material facts regarding any legal or disciplinary events that are material to a client’s or prospective client’s evaluation of our advisory business or the integrity of our management. Koss Olinger and its management persons do not have any reportable legal or disciplinary events to disclose.

## ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Koss Olinger does not, nor does any of the firm’s management, have any applications pending to register, as a futures commission merchant, commodity pool operator, a commodity trading adviser, or an associated person of the foregoing entities.

**ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS (CONTINUED)**

The principal business of Koss Olinger is as a Registered Investment Adviser. The principals and/or related persons of Koss Olinger are also licensed as insurance and securities professionals, and as such, are also in the business of offering securities and insurance products. Approximately 10% of the time of these principals and/or related persons is spent on activities related to these other products.

Certain of Adviser's principals and/or related persons are also registered representatives of Valmark Securities, Inc., a FINRA registered broker-dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons receive commissions for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker-dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions can be higher or lower if placed through Valmark than if placed through another broker-dealer. Valmark provides related persons/registered representatives with due diligence as well as with compliance information and review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by FINRA.

Additionally, certain of Adviser's principals and/or related persons are affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represent numerous insurance companies. Any insurance product placed through these principals and/or related persons generates standard and customary insurance commissions, a portion of which is paid to the principals and/or related persons.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

Valmark may be contacted at the following:

Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Executive Insurance Agency may be contacted at the following:

Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

**ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

All personnel and associated persons of Koss Olinger strive to meet the highest ethical standards of behavior. Koss Olinger has adopted a formal Code of Ethics policy, a copy of which is available to clients upon request.

The objective of Koss Olinger's policy is to assure that all personnel and associated persons clearly understand the level of commitment that is required on behalf of Koss Olinger's clients; to assure that client interests always take priority over the interests of Koss Olinger and its personnel; that personal securities transactions must avoid even the appearance of conflict with the interests of the clients; and that all applicable federal and state securities laws are complied with.

Associated persons of the Adviser are affiliated with Valmark Securities, Inc., a registered broker-dealer. The client will be advised that the Adviser will receive a commission for any securities transactions performed in addition to a fee for investment advice. Activities listed and commissions earned are independent from and in addition to those of the Adviser.

Additionally, certain of Adviser's principals and/or related persons are affiliated with Executive Insurance Agency, Inc., a general insurance agency that represents numerous insurance companies. Any insurance product placed through these principals and/or related persons will generate standard and customary insurance commissions. These, and other sums, may be paid to the principals and/or related persons. Koss Olinger advises its clients that

## ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING (CONTINUED)

the receipt of commissions and other sums by its related persons for securities and insurance transactions may represent a conflict of interest.

No supervised person may trade, either personally or on behalf of others, while in the possession of material, nonpublic information; nor may any personnel of Koss Olinger communicate material, nonpublic information to others.

Koss Olinger has adopted the following principles governing personal investment activities by Koss Olinger's supervised persons:

- At all times, the interests of client accounts will be placed first;
- All personal securities transactions will be conducted in such a manner as to avoid any actual or potential conflict of interest or any abuse of an individual's position of trust and responsibility;
- Supervised persons must not take inappropriate advantage of their positions.

Adviser's supervised persons may buy or sell the same securities that are recommended to clients. Client accounts receive priority over any personal purchases and sales made by the principals and any such transactions will be fully disclosed to the client. Koss Olinger will abide by the rules and regulations of the Insider Trading and Securities Fraud Enforcement Act of 1988.

The Adviser's supervised persons must report to the Chief Compliance Officer ("CCO") all initial security holdings and transactions, as well as ongoing transactions. These transactions are reported and reviewed quarterly by the CCO.

All Adviser's supervised persons and their immediate family members' security transactions are reported on separate trading reports and principally reviewed by the CCO on an ongoing basis, as required.

## ITEM 12 BROKERAGE PRACTICES

### The Custodian and Brokers We Use

Koss Olinger does not maintain custody of your assets that we manage/on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw fees from your account or move money to a third-party account (see [Item 15 – Custody](#), below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we or you instruct them to. While we recommend that you use Schwab as a custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. We cannot manage your account if you do not wish to place your assets with Schwab. Not all advisers require their clients to use a particular broker-dealer or other custodian selected by the adviser. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see "Your Brokerage and Custody Costs").

### How We Select Brokers/Custodians

We seek to select/recommend/use a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (including stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.);
- Availability of investment research and tools that assist us in making investment decisions;
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate price;
- Reputation, financial strength, and stability;
- Prior service to us and our other clients;
- Availability of other products and services that benefit us, as discussed below (see “Products and Services Available to Us from Schwab”).

### **Your Brokerage and Custody Costs**

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab's commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least \$ 10 million of their assets in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account(s). We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How We Select Brokers/Custodians”).

### **Products and Services Available to Us from Schwab**

Schwab Adviser Services™ (formerly called “Schwab Institutional®”) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage—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 those services help us manage or administer our clients' accounts; while others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us quarterly service fees of \$1,200. The following is a more detailed description of Schwab's support services.

**Services That Benefit You.** Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. 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's services described in this paragraph generally benefit you and your account(s).

**Services That May Not Directly Benefit You.** Schwab also makes available 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 (such as duplicate trade confirmations and account statements);
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- Provide pricing and other market data;
- Facilitate payment of our fees from our clients' accounts;
- Assist with back-office functions, recordkeeping, and client reporting.

There are times when Koss Olinger may aggregate trades. These aggregated, or block, trades are only done when advantageous in terms of operational efficiencies. Each client participating in an aggregated order receives the average share price for all of an adviser's transactions in that security on any given day. An adviser receives no additional compensation due to an aggregated order. Any trades must be allocated in a manner that does not consistently help or harm a particular client.

**Services That Generally Benefit Only Us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events; Consulting on technology, compliance, legal, and business needs; Publications and conferences on practice management and business succession.

Schwab may provide some of these services itself. In other cases, it will arrange for third party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

#### **Our Interest in Schwab's Services**

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This 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. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How We Select Brokers/Custodians") and not Schwab's services that benefit only us. We have \$654 million in client assets under management, and we do not believe that recommending our clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

The corporation may suggest the availability of Valmark Securities, Inc., a broker-dealer, to place transactions on behalf of the client. The Adviser principals and Valmark Securities, Inc. will receive commissions based on the compensation schedule for the investment the client chooses to make. Valmark Securities, Inc. is recommended because of the wide variety of products offered, through research it makes available and the excellent client services it provides. Valmark Securities, Inc.'s commissions may not be the lowest in the industry.

Associated persons of the Adviser, when acting as registered representative of Valmark Securities, Inc. will receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker-dealers which may be higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

### ITEM 13 REVIEW OF ACCOUNTS

Reviews will be made on a periodic basis or upon request by the client, or in the event of a substantial change in the client's financial situation, i.e. sale or purchase of assets, death, etc. Changes in financial or family status during the previous year will be reviewed to determine changes in objectives of the client. The client is under no obligation to implement any recommendations by the Adviser nor is the client under obligation to engage the services of the Adviser.

Financial plans and account reviews may be done by any investment adviser representative (IAR) of the Firm listed in the ADV Brochure Part 2B Supplement.

Clients receive quarterly reports, which will generally include a list of transactions for the quarter, current investment allocations, and their account balances. Koss Olinger may exercise discretion upon rebalancing accounts based on the client's investment policy summary.

### ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

Koss Olinger does not provide economic benefit to any person(s) for client referrals. We do receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisers whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

### ITEM 15 CUSTODY

Koss Olinger has selected Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, to maintain custody of client account assets through its Schwab Adviser Services™ division. You should receive account statements sent directly from Schwab, at least quarterly, to the email or postal mailing address that you provided to Schwab. Koss Olinger urges clients to carefully review Schwab's account statements and compare them to the periodic account statements/portfolio reports received from us. Koss Olinger's statements may vary slightly from custodial statements due to differences in transaction reporting or pricing services. Clients are encouraged to notify us at once if they find any discrepancies between these statements. Koss Olinger is independently owned and operated and not affiliated with Schwab.

Under SEC rules and requirements, Koss Olinger may be deemed to have custody of client assets where clients have authorized Koss Olinger to instruct Schwab to move money to another third-party account under a Standing Letter of Authorization ("SLOA"). Koss Olinger has policies and procedures in place to safeguard client funds and securities covered under any such authorization agreements. If you have given us distribution authorization under an SLOA, Schwab will send you a notification letter at the initial set-up, and annually thereafter, asking you to review and confirm the accuracy of the distribution instructions you have authorized. These instructions will include the originating account number and registration, the distribution type, and the recipient account number. The initial and annual notification letters will also provide information on how to change your instructions or remove our authorization directly with Schwab. SLOA protocols followed by Koss Olinger, in conjunction with Schwab, exempt us from the independent verification requirement otherwise required for custodians of client assets.

As a matter of policy and practice, except as noted above, Koss Olinger does not permit personnel of the firm to accept or maintain custody of client assets and will not intentionally hold funds or securities for client accounts. Koss Olinger will conduct reviews from time to time to ensure that the firm and its supervised persons are not inadvertently taking custody of client assets and, where we are deemed to have custody due to existing SLOA agreements, to ensure that our procedures continue to reflect the most recent regulatory guidance and best practices for the safeguarding of client funds and securities.



## ITEM 16 INVESTMENT DISCRETION

Koss Olinger may exercise discretion upon rebalancing accounts based on the client's Investment Policy Summary.

The client allows Koss Olinger to exercise this discretionary authority by signing the Private Client Account Agreement, which is used to open an account. Private Client Account language is as follows regarding discretionary authority: "Client hereby appoints Adviser as client's true and lawful agent with authority to act on client's behalf, based on client's Investment Policy Summary, effect discretionary authority to purchase, sell, and trade securities, including, but not limited to, Equities, Fixed Income Instruments, and Mutual Funds for client's account and all actions necessary or incident to such activities".

## ITEM 17 VOTING CLIENT SECURITIES

As a general matter of firm policy and practice, Koss Olinger does not retain authority over its clients' proxy voting and has left the voting authority to the clients. In this arrangement, proxy ballots are sent directly to the client and not to the Adviser as directed by the custody agreement to be signed by each client. Should the client wish to speak with the Adviser about advice on how to vote their proxies, they may do so by contacting Koss Olinger.

Koss Olinger may in limited circumstances agree to vote proxies on a client's behalf. This is an exception to the firm's general practice in situations where the firm and client have determined that it is in the client's best interest for Koss Olinger to exercise proxy voting on the client's behalf for certain securities. When agreeing to exercise such proxy voting rights, Koss Olinger's duty of care includes, among other things, the duty to avoid any material conflict of interest in proxy voting and to make voting determinations that are in the best interest of the client. To that end, Koss Olinger has designed policies and procedures to vote proxies in accordance with SEC Rule 206(4)-6 under the Investment Advisers Act of 1940. Voting decisions are made by the Managing Director of Investments and reviewed by the CCO as documented in the procedures. Where Koss Olinger has agreed to vote proxies for specified securities, the client will not be permitted to direct our vote on any particular solicitation. Clients desiring a copy of these procedures, additional information regarding the firm's policy on proxy voting or information pertaining to the firm's voting record for the client's shares may submit a request in writing to the Compliance Department at the address listed at the front page of this Brochure or by e-mail to [compliance@kossolinger.com](mailto:compliance@kossolinger.com).

## ITEM 18 FINANCIAL INFORMATION

Koss Olinger is required in this Item to provide certain financial information or disclosures about Koss Olinger's financial condition. Koss Olinger has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to its clients, and has not been the subject of a bankruptcy proceeding. Koss Olinger will not accept payments of more than \$1,200 more than six months in advance.

## PRIVACY POLICY

### Your Privacy is Koss Olinger's Highest Priority

At Koss Olinger and its affiliated companies, our customers are our highest priority. As providers of financial products and services that involve the collection of personal – and often sensitive – information, protecting the confidentiality of that information has been, and will continue to be, a top priority for Koss Olinger. Due to the sensitive nature of this personal information, Koss Olinger believes that you should know how your information is handled, the measures we have taken to safeguard that information and the situations in which we might share your information to complete transactions and/or service your account(s).

Our privacy promise to you is based upon the basic principles of trust, ethics and integrity.

## PRIVACY POLICY (CONTINUED)

### **The Information Collected by Koss Olinger**

When you deal with Koss Olinger, certain personal and financial information is collected from you. Koss Olinger uses this information to serve your financial needs and to fulfill legal and regulatory requirements. The information gathered for these purposes varies depending on the products or services that you request, but may include, for example, your name, address, social security number, net worth, annual income and certain medical information.

### **To Whom Your Information May Be Disclosed**

For both current and former customers, Koss Olinger restricts access to your personal and financial information to those instances described below:

**Individuals.** Your personal and financial information will be provided to those employees, registered representatives, their assistants and those who process information or the transactions of Koss Olinger in connection with the products or services being provided to you.

**Where required by law or regulation.** Koss Olinger may be required by law or regulation to disclose your personal and /or financial information to a third party. For example, in response to a subpoena or to comply with industry rules and regulations.

**As authorized by you.** Only upon your direction or with your permission will Koss Olinger share your information with a third party other than as described in this notice.

**Affiliated companies.** We may share confidential information with service providers such as custodian broker-dealers, investment firms, mutual fund companies, or technical application providers, as needed, to effect transactions, provide account maintenance or customer service to your account.

### **Protection of Information**

Koss Olinger has instituted security procedures that limit employee access to nonpublic personal information to those with a business reason for knowing such information. We educate our employees so that they will understand the importance of confidentiality and customer privacy. All Koss Olinger employees are aware of the company's privacy guidelines and Koss Olinger will take the appropriate disciplinary measures to enforce customer privacy assurances. Koss Olinger maintains appropriate security standards and procedures to prevent unauthorized access to customer information and to preserve the integrity of that information.

### **Business Continuity/Disaster Recovery**

As part of its fiduciary duty to its clients and as a matter of best business practices, Koss Olinger Companies, have adopted policies and procedures for disaster recovery and for continuing Koss Olinger Companies' business in the event of an emergency or a disaster. These policies are designed to allow Koss Olinger Companies to resume providing service to its clients in as short a period of time as possible. These policies are, to the extent practicable, designed to address those specific types of disasters that Koss Olinger Companies might reasonably face given its business and location.



Invested in You

**Form ADV Part 2B**

**Brochure Supplement**

**William David Olinger, III**

**CRD Number 2289684**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-31-2022

This brochure supplement provides information about William David Olinger, III that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Eduardo J. Mordujovich if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

*Additional information about William David Olinger, III is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

William D. Olinger III is a Managing Member and Investment Adviser Representative (IAR) at Koss Olinger Consulting, LLC. He began his wealth management career in 1992. Mr. Olinger specializes in working with new clients by utilizing Koss Olinger's Wealth Navigator System™. His area of focus is learning about the client's goals and objectives and building a customized game plan which allows those aspirations to be attained.

Mr. Olinger graduated from Wake Forest University in 1991. He majored in Economics and minored in Finance. He holds the Certified Investment Management Analyst (CIMA®) certification, administered by the Investments & Wealth Institute and taught in conjunction with The Wharton School, University of Pennsylvania. Mr. Olinger chairs the firm's Investment Advisory Committee and is responsible for analyzing alternative investments and researching macroeconomic trends. He is a contributing writer to the Oxford Club Investment Newsletter, and is an accomplished presenter at industry meetings and estate planning forums.

A founding board member of the Gainesville Community Foundation, Mr. Olinger also serves on the board of the Oak Hall School.

### Education:

- Bachelor of Art in Economics, Wake Forest University
- Certified Investment Management Analyst®

### Business Experience:

- Managing Member and Investment Adviser Representative, Koss Olinger Consulting, LLC, 2009-present
- Managing Member and Financial Adviser, Koss Olinger and Company, LLC, 2009-present
- Registered Representative, Valmark Securities, Inc., 1999-present
- President and Managing Partner, Koss Olinger and Company, Inc., 2005-2009
- President and Managing Partner, Koss Olinger Consulting, Inc., 2004-2009
- Investment Adviser Representative, Koss Olinger Consulting, Inc., 1999-2009
- Financial Adviser, Koss Olinger Financial Group, 1993-2009
- Investment Adviser Representative, Valmark Advisers, Inc., 1999-2004
- Agent/Registered Representative, Ascend Financial Services, 1993-1998

**The Certified Investment Management Analyst® (CIMA®)** certification signifies that an individual has met initial and on-going experience, ethics, education, and examination requirements for the job of investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA® certification are three years of financial services experience and an acceptable ethical background/ compliance history as decided in an admissions peer review process governed by the Ethics Board. To obtain the CIMA® certification, candidates must successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school and pass a Certification Examination. The designation is administered through Investments and Wealth Institute® (IWI). CIMA® designees are required to adhere to IWI's Code of Professional Responsibility and Guidance Document, Disciplinary Rules and Procedures, and Rules and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two ethics and one tax/regulations hours, every two years to maintain the certification.

## DISCIPLINARY INFORMATION

- A. William D. Olinger, III has not had any civil or criminal actions brought against him.
- B. William D. Olinger, III has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. William D. Olinger, III has not had any proceedings before a self-regulatory organization.
- D. William D. Olinger, III has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser. William D. Olinger, III is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 10% of his time is spent on activities related to these other products.

Mr. Olinger is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer (“Valmark”) and, as such, may place securities transactions through Valmark on behalf of his clients. In such instances, the principals and/or related persons will receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by FINRA.

Additionally, Mr. Olinger is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients’ behalf. Any insurance product placed by Mr. Olinger will generate standard and customary insurance commissions and other sums, a portion of which will be paid to Mr. Olinger.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

Valmark may be contacted at: Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

William D. Olinger, III, when acting as a registered representative of Valmark Securities, Inc. will receive commissions through the sale of securities and insurance products to clients. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

## SUPERVISION

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm’s policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm’s procedures, policies, high professional standards, or legal/regulatory requirements.

## SUPERVISION (CONTINUED)

Eduardo J. Mordujovich, as the Chief Compliance Officer, has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

Definition: "Supervised person" means directors, officers and partners of Koss Olinger (or other persons occupying a similar status or performing similar functions); employees of Koss Olinger; and any other person who provides advice on behalf of Koss Olinger and is subject to Koss Olinger's supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Koss Olinger's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief Compliance Officer's responsibilities. This list is provided only as a general reference tool.

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to ensure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
- 2) Maintenance of Registered Representative Office Documentation - The Chief Compliance Officer shall maintain relevant files pertaining to all business conducted by any registered person under the supervision of the Chief Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.
- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall ensure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall ensure that all checks and transactions are posted to appropriate internal records and copies are maintained in the appropriate files.
- 4) Review of Client Accounts -The Chief Compliance Officer shall ensure that all customer accounts receive a periodic review in order to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.
- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.
- 6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.



Invested in You

**Form ADV Part 2B**

**Brochure Supplement**

**Kirk Edward Klein**

**CRD Number 2260326**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-31-2022

This brochure supplement provides information about Kirk Edward Klein that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Eduardo J. Mordujovich if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Kirk Klein is a Managing Member and Investment Adviser Representative (IAR) at Koss Olinger Consulting, LLC. He started his career in 1992 and has been with Koss Olinger since 1995. His years of financial experience have allowed him to counsel affluent individuals and business owners in the areas of estate and business-transition planning. A Certified Financial Planner™ (CFP®) Practitioner and Chartered Financial Consultant® (ChFC®), Mr. Klein specializes in comprehensive financial planning by utilizing the firm's fee based 5 step process known as The Wealth Navigator System™, to help people accumulate, preserve and transfer personal wealth. He is an authority on business continuation and estate planning in closely held family businesses and was named in Kiplinger's Personal Finance magazine's "Who's Who of Florida Certified Financial Planner® Professionals".

Mr. Klein is a graduate of Illinois State University with a Bachelor of Science degree in Finance and Marketing. An accomplished public speaker, he is a frequent presenter and guest lecturer for business and professional groups on topics about retirement, estate and financial planning.

Mr. Klein also enjoys giving back to the community. He is the past Chairman of the Board of Junior Achievement and has served on the boards of several other organizations such as the Rotary Club and Leadership Gainesville Alumni. Mr. Klein currently serves as Board Chair of Oak Hall School and currently serves as a board member for Junior Achievement.

### Education:

- Bachelor of Art in Finance and Marketing, Illinois State University
- CERTIFIED FINANCIAL PLANNER™ Professional
- Chartered Financial Consultant®

### Business Experience:

- Managing Member and Investment Adviser Representative, Koss Olinger Consulting, LLC, 2009-present
- Managing Member and Financial Adviser, Koss Olinger and Company, LLC, 2009-present
- Registered Representative, Valmark Securities, Inc., 1999-present
- Secretary and Managing Partner, Koss Olinger Consulting, Inc., 2004 - 2009
- Secretary and Managing Partner, Koss Olinger and Company, Inc., 2005 - 2009
- Investment Adviser Representative, Koss Olinger Consulting, Inc., 1999-2009
- Financial Adviser, Koss Olinger Financial Group, 1995-2009
- Agent/Registered Representative, Ascend Financial Services, 1993-1998

The **CERTIFIED FINANCIAL PLANNER™**, **CFP®** and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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

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



- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

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

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification. (for more information regarding the CFP® designation: <http://www.cfp.net/>)

**The Chartered Financial Consultant® (ChFC®)** credential was introduced in 1982 as an alternative to the CFP® mark. This designation has the same core curriculum as the CFP® designation, plus two or three additional elective courses that focus on various areas of personal financial planning. The biggest difference is that it does not require candidates to pass a comprehensive board exam, as with the CFP®.

Chartered Financial Consultant is a financial planning designation for the insurance industry awarded by the American College of Bryn Mawr. ChFCs must meet experience requirements and pass exams covering finance and investing. They must have at least three years of experience in the financial industry, and have studied and passed an examination on the fundamentals of financial planning, including income tax, insurance, investment and estate planning.

## DISCIPLINARY INFORMATION

- E. Kirk E. Klein has not had any civil or criminal actions brought against him.
- F. Kirk E. Klein has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- G. Kirk E. Klein has not had any proceedings before a self-regulatory organization.
- H. Kirk E. Klein has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser. Kirk E. Klein is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 10% of his time is spent on activities related to these other products.

Mr. Klein is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons will receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions

## OTHER BUSINESS ACTIVITIES (CONTINUED)

through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by FINRA.

Additionally, Mr. Klein is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Klein will generate standard and customary insurance commissions and other sums, a portion of which will be paid to Mr. Klein.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

Valmark may be contacted at: Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

Mr. Klein, when acting as a registered representative of Valmark Securities, Inc. will receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

## SUPERVISION

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Eduardo J. Mordujovich, as the Chief Compliance Officer, has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

Definition: "Supervised person" means directors, officers and partners of Koss Olinger (or other persons occupying a similar status or performing similar functions); employees of Koss Olinger; and any other person who provides advice on behalf of Koss Olinger and is subject to Koss Olinger's supervision and control.

## SUPERVISION (CONTINUED)

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Koss Olinger's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief Compliance Officer's responsibilities. This list is provided only as a general reference tool.

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to ensure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
- 2) Maintenance of Registered Representative Office Documentation - The Chief Compliance Officer shall maintain relevant files pertaining to all business conducted by any registered person under the supervision of the Chief Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.
- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall ensure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall ensure that all checks and transactions are posted to appropriate internal records and copies maintained in the appropriate files.
- 4) Review of Client Accounts -The Chief Compliance Officer shall ensure that all customer accounts receive a periodic review in order to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.
- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.
- 6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.



Invested in You

**Form ADV Part 2B**

**Brochure Supplement**

**William David Olinger, II**

**CRD Number 352019**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-31-2022

This brochure supplement provides information about William David Olinger, II that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Eduardo J. Mordujovich if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

*Additional information about William David Olinger, II is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

The Co-Founder of Koss Olinger Financial Group with William F. Koss in 1969 and now a Member and Investment Adviser Representative (IAR) at Koss Olinger Consulting, LLC, William D. Olinger II specializes in helping clients manage and preserve their wealth and transfer it to successive generations. With over 45 years of experience in wealth and investment management, Mr. Olinger is a Chartered Life Underwriter® (CLU®) and Chartered Financial Consultant® (ChFC®) with a Masters of Science degree in Financial Services (MSFS) from The American College. In addition, he holds designations in pension planning from Farleigh Dickinson University and Purdue University and is a life and qualifying member of the Million Dollar Round Table. He is the past President of the Gainesville Estate Planning Council and the Gainesville Association of Life Underwriters and is a member of the Financial Planning Association.

Mr. Olinger graduated Phi Kappa Phi from the University of Florida with a Bachelor of Arts degree in Political Science and a minor in Economics. He was a four-year letterman in diving on the University of Florida swim team and President of Sigma Chi Fraternity. An active member of the Central Florida business and civic community, Mr. Olinger has served as Chairman of the Council for Economic Outreach and Chairman of the Board of Trustees of Santa Fe Community College, as well as the Chairman of the Board of Trustees for First Presbyterian Church. He has been President of the March of Dimes, the Gator City Kiwanis Club, the YMCA and has served on the boards of numerous organizations, including the United Way, the Rotary Club of Gainesville, Barnett Bank of Alachua County and the Florida Museum of Natural History.

### Education:

- Bachelor of Art in Political Science and Economics, University of Florida
- Master of Science in Financial Services, American College
- Chartered Financial Consultant®
- Chartered Life Underwriter®

### Business Experience:

- Consultant, Koss Olinger Consulting, LLC, 2016-present
- Consultant, Koss Olinger and Company, LLC, 2016-present
- Investment Adviser Representative, Koss Olinger Consulting, LLC, 2009-2016
- Financial Adviser, Koss Olinger and Company, LLC, 2009-2016
- Branch Manager and Registered Principal, Valmark Securities, Inc., 1999-present
- Vice President and Founding Partner, Koss Olinger Consulting, Inc., 2004 - 2009
- Vice President and Founding Partner, Koss Olinger and Company, Inc., 2005 - 2009
- Investment Adviser Representative, Koss Olinger Consulting, Inc., 1987-2009
- Financial Adviser, Koss Olinger Financial Group, 1969-2009
- President, Koss Olinger and Company, Inc., 1969 - 2004
- Secretary and Treasurer, Koss Olinger Consulting, Inc., 1983-2003
- Branch Manager/Independent Contractor, Raymond James Financial, Inc. 1987-2000

**The Chartered Financial Consultant® (ChFC®)** credential was introduced in 1982 as an alternative to the CFP® mark. This designation has the same core curriculum as the CFP® designation, plus two or three additional elective courses that focus on various areas of personal financial planning. The biggest difference is that it does not require candidates to pass a comprehensive board exam, as with the CFP®.

Chartered Financial Consultant is a financial planning designation for the insurance industry awarded by the American College of Bryn Mawr. ChFCs must meet experience requirements and pass exams covering finance and investing. They must have at least three years of experience in the financial industry, and have studied and passed an examination on the fundamentals of financial planning, including income tax, insurance, investment and estate planning.

**The Chartered Life Underwriter® (CLU®)** is widely considered to be the most respected insurance designation in the industry. This designation was created in 1927 by the American College in Bryn Mawr, Pa. The CLU®; has

traditionally been pursued by agents who wish to specialize in life insurance for business or estate-planning purposes. The current course curriculum for the CLU® includes five required courses plus three elective courses. The required courses include the following:

- Fundamentals of insurance planning
- Estate planning
- Life insurance law
- Planning for business owners
- Individual life insurance

The three elective courses can be chosen from such subjects as the following:

- Financial planning
- Group benefits
- Health insurance
- Retirement planning
- Income taxation
- Investment planning

**The Master of Science in Financial Services (MSFS)** is a degree program designed to advance the careers of a wide range of planning professionals including financial planners, life insurance specialists, trust officers and investment consultants.

The MSFS degree requires the completion of 36 course credits (6 credits from the residency and 30 credits from the remaining required and elective courses.) Course topics include:

- Financial Planning
- Investments
- Real Estate
- Portfolio Management
- Insurance
- Retirement Plans & Employee Benefits

## DISCIPLINARY INFORMATION

- A. William D. Olinger, II has not had any civil or criminal actions brought against him.
- B. William D. Olinger, II has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. William D. Olinger, II has not had any proceedings before a self-regulatory organization.
- D. William D. Olinger, II has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser. William D. Olinger, II is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 10% of his time is spent on activities related to these other products.

Mr. Olinger is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons will receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for

other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by the FINRA.

Additionally, Mr. Olinger is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Olinger will generate standard and customary insurance commissions and other sums, a portion of which will be paid to Mr. Olinger.

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Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

William D. Olinger, II, when acting as registered representative of Valmark Securities, Inc. will receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

## SUPERVISION

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Eduardo J. Mordujovich, as the Chief Compliance Officer, has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

Definition: "Supervised person" means directors, officers and partners of Koss Olinger (or other persons occupying a similar status or performing similar functions); employees of Koss Olinger; and any other person who provides advice on behalf of Koss Olinger and is subject to Koss Olinger's supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Koss Olinger's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief Compliance Officer's responsibilities. This list is provided only as a general reference tool.

**SUPERVISION (CONTINUED)**

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to ensure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
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- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.
- 6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.





Invested in You

**Form ADV Part 2B**

**Brochure Supplement**

**William Frederick Koss**

**CRD Number 713150**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-31-2022

This brochure supplement provides information about William Frederick Koss that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Eduardo J. Mordujovich if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

William F. Koss has worked professionally for over 45 years in the financial disciplines of estate planning and investment management and in 1969 joined William D. Olinger II to establish Koss Olinger Financial Group. He is currently a Member and Investment Adviser Representative (IAR) at Koss Olinger Consulting, LLC. As one of the firm's Founding Partners, he specializes in helping clients preserve their wealth and transfer it to successive generations.

A Chartered Life Underwriter® (CLU®) and Chartered Financial Consultant® (ChFC®), Mr. Koss is a life and qualifying member of the Million Dollar Round Table. His 40 continuous years of qualification, along with his professional designations place him among the top 100 professional planners in the world.

In addition, he has published numerous articles in professional journals and consumer publications and is the author of the book, "Pond Birds", the only history of the University of Florida's basketball program. Mr. Koss was a three-year letterman in basketball at the University of Florida and was inducted into the University of Florida Athletic Hall of Fame in 2008. He remains visible to Florida fans through his work as a television sports commentator and public speaker.

He grew up in Bridgeport, Ohio, received a post-graduate degree from Manlius Military Academy, earned a Bachelors degree in Business Administration at the University of Florida, and holds a Master's of Science degree in Financial Services from The American College.

A founding member and past Chairman of the Council for Economic Outreach, Mr. Koss won the J. Wayne Reitz Award for his contributions to the region's economic development. The Gainesville Business Magazine named him Financial Services Man of the Year in 1990, and The Gainesville Sun recognized him as the 1994 Business Person of the Year.

### Education:

- Bachelor of Art in Business Administration, University of Florida
- Master of Science in Financial Services, American College
- Chartered Financial Consultant®
- Chartered Life Underwriter

### Business Experience:

- Consultant, Koss Olinger Consulting, LLC, 2016-present
- Consultant, Koss Olinger and Company, LLC, 2016-present
- Investment Adviser Representative, Koss Olinger Consulting, LLC, 2009-2016
- Financial Adviser, Koss Olinger and Company, LLC, 2009-2016
- Registered Representative, Valmark Securities, Inc., 1999-present
- Treasurer and Founding Partner, Koss Olinger Consulting, Inc., 2004 - 2009
- Treasurer and Founding Partner, Koss Olinger and Company, Inc., 2005 - 2009
- Investment Adviser Representative, Koss Olinger Consulting, Inc., 1987-2009
- Financial Adviser, Koss Olinger Financial Group, 1969-2009
- Secretary/Treasurer, Koss Olinger and Company, Inc., 1969 - 2004
- President, Koss Longer Consulting, Inc., 1983-2003
- Registered Representative, Ascend Financial Services, 1989-1998

**The Chartered Financial Consultant® (ChFC®)** credential was introduced in 1982 as an alternative to the CFP® mark. This designation has the same core curriculum as the CFP® designation, plus two or three additional elective courses that focus on various areas of personal financial planning. The biggest difference is that it does not require candidates to pass a comprehensive board exam, as with the CFP®.

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- Fundamentals of insurance planning
- Estate planning
- Life insurance law
- Planning for business owners
- Individual life insurance

The three elective courses can be chosen from such subjects as the following:

- Financial planning
- Group benefits
- Health insurance
- Retirement planning
- Income taxation
- Investment planning

## DISCIPLINARY INFORMATION

- A. William F. Koss has not had any civil or criminal actions brought against him.
- B. William F. Koss has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. William F. Koss has not had any proceedings before a self-regulatory organization.
- D. William F. Koss has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser. William F. Koss is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 10% of his time is spent on activities related to these other products.

Mr. Koss is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons will receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by FINRA.

## OTHER BUSINESS ACTIVITIES (CONTINUED)

Additionally, Mr. Koss is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Koss will generate standard and customary insurance commissions and other sums, a portion of which will be paid to Mr. Koss.

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Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

William F. Koss, when acting as registered representative of Valmark Securities, Inc. will receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

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## SUPERVISION

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Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.

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4) Review of Client Accounts -The Chief Compliance Officer shall ensure that all customer accounts receive a periodic review in order to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.

5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.

6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.



Invested in You

**Form ADV Part 2B  
Brochure Supplement**

**William James Rossi, III**

**CRD Number 2909610**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-31-2022

This brochure supplement provides information about William James Rossi, III that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Eduardo J. Mordujovich if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

*Additional information about William James Rossi, III is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

William J. Rossi is a Partner and Investment Adviser Representative (IAR) at Koss Olinger Consulting, LLC. He began his financial services career in 1997 after earning Bachelor of Science degrees in Finance and Economics from the University of Florida. Soon after, he obtained both the Certified Financial Planner (CFP®) and Chartered Financial Consultant (ChFC®) designations.

Mr. Rossi's areas of expertise are investment management, estate planning, and creating income distribution strategies during retirement. He sits on Koss Olinger's Investment Advisory Committee. Mr. Rossi's professional insights about comprehensive fee-based planning, as used in The Wealth Navigator System™, have been quoted in local and national publications, including Money magazine. Additionally, Mr. Rossi has spoken at industry conferences such as Million Dollar Round Table's "Top of the Table".

A resident of Gainesville since 1987, Mr. Rossi is active in the community serving on board positions at University of Florida's Performing Arts Center, Tyler's Hope, and Stop! Children's Cancer and is an active member of NAIFA Gainesville, and Gainesville Estate Planning Council. Mr. Rossi is also a member of the Rotary Club, and Leadership Gainesville Alumni.

### Education:

- Bachelor of Science in Finance and Economics, University of Florida
- CERTIFIED FINANCIAL PLANNER™ Professional
- Chartered Financial Consultant®

### Business Experience:

- Member and Investment Adviser Representative, Koss Olinger Consulting, LLC, 2009-present
- Member and Financial Adviser, Koss Olinger and Company, LLC, 2009-present
- Registered Representative, Valmark Securities, Inc., 1999-present
- Partner and Investment Adviser Representative, Koss Olinger Consulting, Inc., 2004 - 2009
- Partner and Financial Adviser, Koss Olinger and Company, Inc., 2005 - 2009
- Investment Adviser Representative, Koss Olinger Consulting, Inc., 1997-2009
- Financial Adviser, Koss Olinger Financial Group, 1997-2009
- Registered Representative/Independent Contractor Raymond James Financial, Inc., 1997-2000
- Finance Intern, Koss Olinger Financial Group, 1996-1997

The **CERTIFIED FINANCIAL PLANNER™**, **CFP®** and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelors Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to

correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

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

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification. (for more information regarding the CFP® designation: <http://www.cfp.net/>)

**The Chartered Financial Consultant® (ChFC®)** credential was introduced in 1982 as an alternative to the CFP® mark. This designation has the same core curriculum as the CFP® designation, plus two or three additional elective courses that focus on various areas of personal financial planning. The biggest difference is that it does not require candidates to pass a comprehensive board exam, as with the CFP®.

Chartered Financial Consultant is a financial planning designation for the insurance industry awarded by the American College of Bryn Mawr. ChFCs must meet experience requirements and pass exams covering finance and investing. They must have at least three years of experience in the financial industry, and have studied and passed an examination on the fundamentals of financial planning, including income tax, insurance, investment and estate planning.

## DISCIPLINARY INFORMATION

- A. William J. Rossi, III has not had any civil or criminal actions brought against him.
- B. William J. Rossi, III has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. William J. Rossi, III has not had any proceedings before a self-regulatory organization.
- D. William J. Rossi, III has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser. William J. Rossi, III, is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 10% of his time is spent on activities related to these other products.

Mr. Rossi is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons will receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for



other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by FINRA.

Additionally, Mr. Rossi is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Rossi will generate standard and customary insurance commissions and other sums, a portion of which will be paid to Mr. Rossi.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

Valmark may be contacted at: Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## **ADDITIONAL COMPENSATION**

William J. Rossi, III, when acting as registered representative of Valmark Securities, Inc. will receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

## **SUPERVISION**

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Eduardo J. Mordujovich, as the Chief Compliance Officer, has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

Definition: "Supervised person" means directors, officers and partners of Koss Olinger (or other persons occupying a similar status or performing similar functions); employees of Koss Olinger; and any other person who provides advice on behalf of Koss Olinger and is subject to Koss Olinger's supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Koss Olinger's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief Compliance Officer's responsibilities. This list is provided only as a general reference tool.

**SUPERVISION (CONTINUED)**

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- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall ensure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall ensure that all checks and transactions are posted to appropriate internal records and copies maintained in the appropriate files.
- 4) Review of Client Accounts -The Chief Compliance Officer shall ensure that all customer accounts receive a periodic review in order to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.
- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.
- 6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.





Invested in You

**Form ADV Part 2B**

**Brochure Supplement**

**Brian Earl Watson**

**CRD Number 3181953**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-31-2022

This brochure supplement provides information about Brian Earl Watson that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Eduardo J. Mordujovich if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Brian Watson is a Partner and Investment Adviser Representative (IAR) at Koss Olinger Consulting, LLC. He began his wealth management career in 1998 after earning a Bachelor of Science degree in Finance from the University of Florida. A Certified Financial Planner (CFP®) practitioner, Mr. Watson's areas of expertise are retirement planning, investment management and estate planning.

Mr. Watson brings strong information technology skills to the firm. He was instrumental in designing the firm's management reporting systems and helped develop The Wealth Navigator System™, an advanced planning process that is at the center of the firm's overall consulting services.

### Education:

- Bachelor of Science in Business Administration - Finance, University of Florida
- CERTIFIED FINANCIAL PLANNER™ Professional
- CERTIFIED DIVORCE FINANCIAL ANALYST® Professional

### Business Experience:

- Member and Investment Adviser Representative, Koss Olinger Consulting, LLC, 2009-present
- Member and Financial Adviser, Koss Olinger and Company, LLC, 2009-present
- Registered Representative, Valmark Securities, Inc., 1999-present
- Partner and Investment Adviser Representative, Koss Olinger Consulting, Inc., 2004-2009
- Partner and Financial Adviser, Koss Olinger and Company, Inc., 2005-2009
- Investment Adviser Representative, Koss Olinger Consulting, Inc., 2000-2009
- Financial Adviser, Koss Olinger Financial Group, 1998-2009

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**The CERTIFIED DIVORCE FINANCIAL ANALYST® (CFDA®)** designation is available to individuals with a minimum of three years of professional experience in finance or divorce and a Bachelor's degree. This includes experience as a financial professional, accountant, or matrimonial lawyer.

- Qualifications – A course specific to financial issues surrounding divorce must be completed and the designee must successfully pass three assessments and submit a reviewed case study before the designation can be used.
- Examination – Modules 1, 2, and 3 each conclude with a 100-question, multiple-choice exam. Module 4 concludes with a comprehensive case-study exam consisting of 50 multiple-choice questions.
- Candidates have two hours to complete each exam. Candidates must pass each module exam with a 70% or higher to receive the CDFA® designation. CDFA candidates will study a broad range of topics regarding the financial aspects of divorce.
- Continuing Education – After completing the CDFA® course, the designation is valid for one year, after which the designee must pay a \$295 annual reinstatement fee. To retain the CDFA® designation, the designee must also obtain 15 divorce-related hours of continuing education every two years.

## DISCIPLINARY INFORMATION

- A. Brian Watson has not had any civil or criminal actions brought against him.
- B. Brian Watson has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
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## OTHER BUSINESS ACTIVITIES

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## OTHER BUSINESS ACTIVITIES (CONTINUED)

Additionally, Mr. Watson is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Watson will generate standard and customary insurance commissions and other sums, a portion of which will be paid to Mr. Watson.

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## ADDITIONAL COMPENSATION

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## SUPERVISION

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**SUPERVISION (CONTINUED)**

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**Form ADV Part 2B**

**Brochure Supplement**

**Timothy Alderson Roark**

**CRD Number 5949136**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-31-2022

This brochure supplement provides information about Timothy Alderson Roark that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure.

Please contact Eduardo J. Mordujovich if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Timothy Roark is a Partner and Investment Adviser Representative (IAR) at Koss Olinger Consulting, LLC at Koss Olinger Consulting, LLC. He began his wealth management career in 2011 after receiving a Masters degree in Business from Duke University. Mr. Roark is a CERTIFIED FINANCIAL PLANNER™ (CFP®), earning the designation in 2014. Mr. Roark's areas of expertise are retirement planning, investment management and estate planning.

Mr. Roark received a Bachelor of Arts degree in Anthropology from Davidson College. He was a four-year member of the men's varsity soccer team at Davidson. Mr. Roark serves on the boards for the Alachua County Education Foundation, Dance Alive National Ballet, and Oak Hall School; the Finance Committee for Conservation Burial; and as President for the Education Foundation. Mr. Roark also mentors with Take Stock in Children, receiving 2020's Mentor of the Year award.

### Education:

- Masters in Business, Duke University
- Bachelor of Art in Anthropology, Davidson College
- CERTIFIED FINANCIAL PLANNER™ Professional

### Business Experience:

- Investment Adviser Representative, Koss Olinger Consulting, LLC, 2011-present
- Registered Representative, Valmark Securities, Inc., 2011-present
- Finance Intern, Koss Olinger and Company, LLC, 2009-2010

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### DISCIPLINARY INFORMATION

- A. Timothy Roark has not had any civil or criminal actions brought against him.
- B. Timothy Roark has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Timothy Roark has not had any proceedings before a self-regulatory organization.
- D. Timothy Roark has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

### OTHER BUSINESS ACTIVITIES

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## ADDITIONAL COMPENSATION

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**Form ADV Part 2B**

**Brochure Supplement**

**Shannon Louise Reintgen**

**CRD Number 5893794**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-31-2022

This brochure supplement provides information about Shannon Louise Reintgen that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Eduardo J. Mordujovich if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Shannon Reintgen is an Investment Adviser Representative (IAR) at Koss Olinger Consulting, LLC. She began her wealth management career in 2013 after receiving a Bachelor of Science degree in Finance from the University of Florida. Mrs. Reintgen has both the Certified Financial Planner (CFP®) and Chartered Financial Consultant (ChFC®) designations. Shannon is the Treasurer for both Miss Gainesville and Junior League of Gainesville.

### Education:

- Bachelor of Science in Finance, University of Florida (2012)
- CERTIFIED FINANCIAL PLANNER™ Professional
- Chartered Financial Consultant®

### Business Experience:

- Investment Adviser Representative, Koss Olinger Consulting, LLC, 2013-present
- Registered Representative, Valmark Securities, Inc., 2013-present
- Contracts Administrator, United Launch Alliance, 2012-2013
- Finance Intern, Koss Olinger and Company, LLC, 2011-2012

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The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelors Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

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

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification. (for more information regarding the CFP® designation: <http://www.cfp.net/>)

**The Chartered Financial Consultant® (ChFC®)** credential was introduced in 1982 as an alternative to the CFP® mark. This designation has the same core curriculum as the CFP® designation, plus two or three additional elective courses that focus on various areas of personal financial planning. The biggest difference is that it does not require candidates to pass a comprehensive board exam, as with the CFP®.

Chartered Financial Consultant is a financial planning designation for the insurance industry awarded by the American College of Bryn Mawr. ChFCs must meet experience requirements and pass exams covering finance and investing. They must have at least three years of experience in the financial industry, and have studied and passed an examination on the fundamentals of financial planning, including income tax, insurance, investment and estate planning.

### DISCIPLINARY INFORMATION

- A. Shannon Reintgen has not had any civil or criminal actions brought against her.
- B. Shannon Reintgen has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Shannon Reintgen has not had any proceedings before a self-regulatory organization.
- D. Shannon Reintgen has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

### OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser, Shannon Reintgen, is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 10% of her time is spent on activities related to these other products.

Mrs. Reintgen is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons will receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by the FINRA.

Additionally, Mrs. Reintgen is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mrs. Reintgen will generate standard and customary insurance commissions and other sums, a portion of which will be paid to Mrs. Reintgen.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

Valmark may be contacted at: Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

Shannon Reintgen, when acting as registered representative of Valmark Securities, Inc. will receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

## SUPERVISION

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Eduardo J. Mordujovich, as the Chief Compliance Officer, has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

Definition: "Supervised person" means directors, officers and partners of Koss Olinger (or other persons occupying a similar status or performing similar functions); employees of Koss Olinger; and any other person who provides advice on behalf of Koss Olinger and is subject to Koss Olinger's supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Koss Olinger's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief Compliance Officer's responsibilities. This list is provided only as a general reference tool.

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to ensure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
- 2) Maintenance of Registered Representative Office Documentation - The Chief Compliance Officer shall maintain relevant files pertaining to all business conducted by any registered person under the supervision of the Chief Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.
- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall ensure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall ensure that all checks and transactions are posted to appropriate internal records and copies maintained in the appropriate files.
- 4) Review of Client Accounts -The Chief Compliance Officer shall ensure that all customer accounts receive a periodic review in order to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.
- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.
- 6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.





**Form ADV Part 2B**

**Brochure Supplement**

**Mitchell Hawkes Hay**

**CRD Number 6344587**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-31-2022

This brochure supplement provides information about Mitchell Hawkes Hay that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Eduardo J. Mordujovich if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mitchell Hay is an Investment Adviser Representative (IAR) at Koss Olinger Consulting, LLC. He started his wealth management career in 2016 after earning a degree in Finance and minor in Economics, Insurance and Personal Wealth Management from the University of Alabama. Mr. Hay obtained both the Certified Financial Planner (CFP®) and Chartered Financial Consultant (ChFC®) designations, administered by the American College of Financial Services.

Mr. Hay works with clients to learn about their goals and objectives and building a customized gameplan by utilizing Koss Olinger's Wealth Navigator System™. He has experience with 401(k) advising with a focus on life insurance placement and service. He also sits on the firm's Investment Advisory Committee.

Mr. Hay mentors students through the Take Stock in Children with the Alachua County Education Foundation and is a board member of the YMCA of North Central Florida.

### Education:

- Bachelor of Science in Finance, University of Alabama
- CERTIFIED FINANCIAL PLANNER™ Professional
- Chartered Financial Consultant®

### Business Experience:

- Investment Adviser Representative, Koss Olinger Consulting, LLC, 2017-present
- Registered Representative, Valmark Securities, Inc., 2017-present
- Registered Representative, Fidelity Investments, 2016-2017

**The CERTIFIED FINANCIAL PLANNER™, CFP®** and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelors Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
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- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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Chartered Financial Consultant is a financial planning designation for the insurance industry awarded by the American College of Bryn Mawr. ChFCs must meet experience requirements and pass exams covering finance and investing. They must have at least three years of experience in the financial industry, and have studied and passed an examination on the fundamentals of financial planning, including income tax, insurance, investment and estate planning.

## DISCIPLINARY INFORMATION

- A. Mitchell Hay has not had any civil or criminal actions brought against his.
- B. Mitchell Hay has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Mitchell Hay has not had any proceedings before a self-regulatory organization.
- D. Mitchell Hay has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser. Mitchell Hay is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 10% of his time is spent on activities related to these other products.

Mr. Hay is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons will receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by the FINRA.

Additionally, Mr. Hay is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Hay will generate standard and customary insurance commissions and other sums, a portion of which will be paid to Mr. Hay.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

## OTHER BUSINESS ACTIVITIES (CONTINUED)

Valmark may be contacted at: Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

Mitchell Hay, when acting as registered representative of Valmark Securities, Inc. will receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

## SUPERVISION

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- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.

**SUPERVISION (CONTINUED)**

6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.



**Form ADV Part 2B**

**Brochure Supplement**

**Benjamin Arda Doty**

**CRD Number 5983229**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-31-2022

This brochure supplement provides information about Benjamin Arda Doty that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Eduardo J. Mordujovich if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Benjamin Doty is Managing Director of Investments at Koss Olinger Consulting, LLC. He began his investment management career in 2002 and has been employed at Koss Olinger since 2011, where he is responsible for evaluating investment and portfolio performance and providing strategic portfolio adjustment recommendations. Prior to joining Koss Olinger, he worked in various institutional fixed income roles. He earned the right to use the CFA® designation in 2004.

### Education:

- Bachelor of Arts in Economics, University of Georgia
- Master of Business Administration, University of Georgia
- Chartered Financial Analyst® (CFA®) Charterholder

### Business Experience:

- Managing Director of Investments, Koss Olinger Consulting, LLC, 2011-present
- Client Portfolio Manager, Galliard Capital, 2010-2011
- AVP, Senior Financial Analyst, Greater Bay Bancorp, 2003-2007
- Credit Analyst, Stamper Capital, 2002-2003
- Financial Analyst, Nortel Networks, 2001-2002

The Chartered Financial Analyst® (“CFA®”) charter is a professional designation established in 1962 and awarded by CFA® Institute. To earn the CFA® charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA® Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA® charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA® Institute Code of Ethics and Standards of Professional Conduct. CFA® is a trademark owned by CFA® Institute.

## DISCIPLINARY INFORMATION

- A. Benjamin Doty has not had any civil or criminal actions brought against him.
- B. Benjamin Doty has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Benjamin Doty has not had any proceedings before a self-regulatory organization.
- D. Benjamin Doty has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

Mr. Doty, though a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer (“Valmark”), is dedicated to the investment advisory activities of Koss Olinger and does not have any other business activities.

Valmark Securities is a material relationship to the Adviser, but is not a related person as defined in Form ADV.

Valmark may be contacted at: Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

## ADDITIONAL COMPENSATION

Benjamin Doty is dedicated to the investment advisory activities of Koss Olinger and does not receive any additional forms of compensation.

## SUPERVISION

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Eduardo J. Mordujovich, as the Chief Compliance Officer has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

Definition: "Supervised person" means directors, officers and partners of Koss Olinger (or other persons occupying a similar status or performing similar functions); employees of Koss Olinger; and any other person who provides advice on behalf of Koss Olinger and is subject to Koss Olinger's' supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Koss Olinger's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief Compliance Officer's responsibilities. This list is provided only as a general reference tool.

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to ensure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
- 2) Maintenance of Registered Representative Office Documentation - The Chief Compliance Officer shall maintain relevant files pertaining to all business conducted by any registered person under the supervision of the Chief Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.
- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall ensure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall ensure that all checks and transactions are posted to appropriate internal records and copies maintained in the appropriate files.
- 4) Review of Client Accounts -The Chief Compliance Officer shall ensure that all customer accounts receive a periodic review in order to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.
- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.
- 6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.





Invested in You

**Form ADV Part 2B**

**Brochure Supplement**

**Brittney Drew Olinger**

**CRD Number 7286947**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-31-2022

This brochure supplement provides information about Brittney Drew Olinger that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Eduardo J. Mordujovich if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Brittney Olinger is an Investment Adviser Representative (IAR) at Koss Olinger Consulting, LLC. She began her finance career in 2015 and received a Bachelor of Arts degree in Economics and Management from the University of Oxford. She holds the Certified Investment Management Analyst (CIMA®) certification, administered by the Investments & Wealth Institute® and taught in conjunction with Yale School of Management. She also holds the Certified Divorce Financial Analyst (CFDA®) certification, administered by the Institute for Divorce Financial Analysts (IDFA®).

### Education:

- Bachelor of Economics and Management, University of Oxford, UK
- Certified Investment Management Analyst®

### Business Experience:

- Investment Adviser Representative, Koss Olinger Consulting, LLC, 2021-present
- Registered Representative, Valmark Securities, Inc., 2020-present
- Spring Analyst, BNP Paribas, 2015
- Summer Analyst, BNP Paribas, 2016
- High Yield Credit Sales, BNP Paribas, 2017-2020

**The Certified Investment Management Analyst® (CIMA®)** certification signifies that an individual has met initial and on-going experience, ethics, education, and examination requirements for the job of investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA® certification are three years of financial services experience and an acceptable ethical background/ compliance history as decided in an admissions peer review process governed by the Ethics Board. To obtain the CIMA® certification, candidates must successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school and pass a Certification Examination. The designation is administered through Investments and Wealth Institute® (IWI). CIMA® designees are required to adhere to IWI's Code of Professional Responsibility and Guidance Document, Disciplinary Rules and Procedures, and Rules and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two ethics and one tax/regulations hours, every two years to maintain the certification.

**The CERTIFIED DIVORCE FINANCIAL ANALYST® (CFDA®)** designation is available to individuals with a minimum of three years of professional experience in finance or divorce and a Bachelor's degree. This includes experience as a financial professional, accountant, or matrimonial lawyer.

- Qualifications – A course specific to financial issues surrounding divorce must be completed and the designee must successfully pass three assessments and submit a reviewed case study before the designation can be used.
- Examination – Modules 1, 2, and 3 each conclude with a 100-question, multiple-choice exam. Module 4 concludes with a comprehensive case-study exam consisting of 50 multiple-choice questions.
- Candidates have two hours to complete each exam. Candidates must pass each module exam with a 70% or higher to receive the CDFA® designation. CDFA candidates will study a broad range of topics regarding the financial aspects of divorce.
- Continuing Education – After completing the CDFA® course, the designation is valid for one year, after which the designee must pay a \$295 annual reinstatement fee. To retain the CDFA® designation, the designee must also obtain 15 divorce-related hours of continuing education every two years.

## DISCIPLINARY INFORMATION

- A. Brittney Olinger has not had any civil or criminal actions brought against her.

**DISCIPLINARY INFORMATION (CONTINUED)**

- B. Brittney Olinger has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Brittney Olinger has not had any proceedings before a self-regulatory organization.
- D. Brittney Olinger has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

**OTHER BUSINESS ACTIVITIES**

The principal business of Koss Olinger is as a Registered Investment Adviser, Brittney Olinger, is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 10% of her time is spent on activities related to these other products.

Ms. Olinger is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer (“Valmark”) and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons will receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by the FINRA.

Additionally, Ms. Olinger is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients’ behalf. Any insurance product placed by Ms.

Olinger will generate standard and customary insurance commissions and other sums, a portion of which will be paid to Ms. Olinger.

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Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

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**ADDITIONAL COMPENSATION**

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There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

**SUPERVISION**

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent

any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Eduardo J. Mordujovich, as the Chief Compliance Officer, has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

Definition: "Supervised person" means directors, officers and partners of Koss Olinger (or other persons occupying a similar status or performing similar functions); employees of Koss Olinger; and any other person who provides advice on behalf of Koss Olinger and is subject to Koss Olinger's supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Koss Olinger's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief Compliance Officer's responsibilities. This list is provided only as a general reference tool.

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to ensure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
- 2) Maintenance of Registered Representative Office Documentation - The Chief Compliance Officer shall maintain relevant files pertaining to all business conducted by any registered person under the supervision of the Chief Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.
- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall ensure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall ensure that all checks and transactions are posted to appropriate internal records and copies maintained in the appropriate files.
- 4) Review of Client Accounts -The Chief Compliance Officer shall ensure that all customer accounts receive a periodic review in order to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.
- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.
- 6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.