

Item 1 – Cover Page  
**FORM ADV Part 2A**

**Plotkin Financial Advisors, LLC**  
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**March 2018**

**This brochure provides information about the qualifications and business practices of Plotkin Financial Advisors, LLC. If you have any questions about the contents of this Brochure, please contact us at (301) 907-9790 and/or Sarah Hunt at [Shunt@pfallc.com](mailto:Shunt@pfallc.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 Plotkin Financial Advisors, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Plotkin Financial Advisors, LLC is 127635.**

**Any references to Plotkin Financial Advisors, LLC as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.**

## Item 2 - MATERIAL CHANGES

March 2018

Item 4 – Amended assets under management to reflect discretionary assets under management for the year ending December 31, 2017.

Item 15 – Amended disclosure to explain PFA will have custody if PFA deducts its advisory fees from your account if you have a standing letter of authorization (SLOA) to transfer funds or securities to a third party and PFA has the ability to direct transfers, change the amount, and/or the timing of the transfer.

September 2017

Item 4 and Item 8 – Added disclosure about the use of structured products and added disclosure about the risks associated with structured products. Specifically, structured products have the following risks:

Alternative Investments and Structured Products risks include:

- No readily available market for liquidation, therefore generally illiquid
- Not listed on any securities exchange and there may not be a secondary market in which to sell the security
- Significant market value fluctuations
- Potential loss of principal
- Long term investments that could range to 20 years
- Unpredictable return of investment, payment of interest or dividends
- Difficulty in ascertaining an accurate value
- Complex products and can be expensive
- Structured products often have credit and call risks
- Tax treatment can be complicated

June 2017

Item 10 – Added disclosure about Monarch Global Partners, LLC. Monarch Global Partners, LLC is indirectly owned by Shimshon Plotkin, sole owner and advisory representative of PFA, and Ittai Dvir, an advisory representative of PFA. Monarch Global Partners, LLC is a company that acts as a marketing company on behalf of First Trust. Monarch Global Partners markets the First Trust exchange traded funds to citizens of Israel and potentially other non-US countries as approved by First Trust. Monarch Global Partners will be compensated for marketing services by receiving compensation from First Trust based on a percentage of the First Trust exchange traded fund sales to Israeli citizens or other non-US citizens. This is a conflict of interest to suggest First Trust exchange traded funds over other securities since Monarch will receive compensation as a result of sales in Israel. To mitigate this conflict of interest this disclosure is provided to you.

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At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes.

## Plotkin Financial Advisors, LLC

The material changes discussed above are only those changes that have been made to this brochure since the firm's last annual update of the brochure. The date of the last annual update of the brochure was February 2018.

Pursuant to SEC 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 fiscal year, which is December 31st. We may further provide other ongoing disclosure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on change or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting Sarah Hunt at (301) 907-9790 and/or at [shunt@pfallc.com](mailto:shunt@pfallc.com). Additional information about Plotkin Financial Advisors, LLC is also available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The website also provides information about any persons affiliated with Plotkin Financial Advisors, LLC who are registered, or are required to be registered, as investment adviser representatives of Plotkin Financial Advisors, LLC.

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#### **Item 4 - ADVISORY BUSINESS**

Plotkin Financial Advisors, LLC (hereinafter referred to as “PFA”) is an investment advisory firm offering a variety of advisory services customized to your individual needs.

- A. PFA was established in 2003. PFA was established in 2000. Shimshon Plotkin is full owner.
- B. PFA offers the following advisory services. Each of the services is more fully described below.
  - Asset Management Services
  - Financial Planning Services
- C. PFA tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities.

PFA follows an eight step process in providing its services:

1. Listen to your goals and objectives
2. Review your current financial and investment situation.
3. Discuss issues relevant to your financial goals including retirement, cash flow needs, disposition of assets at death, expectations about returns, feels about risk tolerance, and expectations about the relationship with PFA
4. Evaluate your current investment strategy
5. Develop recommendations including investment selection, strategies, asset allocation, insurance (life, disability, long-term care), and estate planning
6. Present your financial plan
7. Implementation
8. Ongoing and continuous monitoring

Depending on the services you have requested, PFA will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
  - Investment objectives
  - Investment horizon
  - Financial needs
  - Cash flow analysis
  - Cost of living needs
  - Education needs
  - Savings tendencies
  - Other applicable financial information required by PFA in order to provide the investment advisory services requested.
- D. PFA offers its asset management services as a wrap program, depending on the custodian selected. PFA offers a wrap program if a client selects Charles Schwab & Co., Inc. (“Schwab”) as the custodian. Client will pay a single fee for bundled services (i.e. investment advisory, brokerage, custody). The services included in a wrap fee agreement will depend upon each client’s particular need. Please Note: When managing a client’s account on a wrap fee

basis, PFA shall receive as payment for its investment advisory services, the balance of the wrap fee after all other costs incorporated into the wrap fee have been deducted.

There is no significant difference between how PFA manages wrap fee accounts and non-wrap fee accounts. However, as stated above, if a client determines to engage PFA on a wrap fee basis the client will pay a single fee for bundled services (i.e. investment advisory, brokerage, custody).

- E. As of December 31, 2017, we have approximately \$112,544,500 of client assets under our discretionary management and no assets under non-discretionary management.

### **Asset Management Services**

Upon PFA completing its analysis of your situation, PFA customizes your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time and your financial situation, goals and objectives. PFA manages your account either based on a model designed by PFA and utilized with other clients or customizes your account around a model allocation. PFA's objective is to establish a suitable allocation for the client across all of a client's investment holdings in an attempt to reduce risk and market volatility.

PFA will schedule a meeting with you and present the recommended portfolio allocation. Upon your approval, PFA will implement the portfolio allocation. PFA will provide continuous and ongoing management of your account.

Each client's portfolio is customized to the client. PFA will examine a client's entire investment portfolio, including taking into consideration the client's employer retirement accounts, if possible, and design an asset allocation specific to the client based on the client's objectives, risk tolerance, time horizon and investment goals. Client's portfolios may be similar or dissimilar depending on investment objectives and goals, timing of investment and client investment sophistication.

PFA offers asset management services on a discretionary and nondiscretionary basis. If you grant PFA discretionary authority, PFA will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you. PFA may actively trade securities and hold such holdings for periods of 30 days or less or maintain positions for longer or shorter term periods. Discretionary authority will be granted by you to PFA by execution of the Investment Advisory Agreement. If you elect to have your accounts managed on a nondiscretionary basis, no changes will be made to the allocation of your account without prior consultation with you and your expressed agreement.

Client's portfolio may consist of stocks, bonds, unit investment trusts (UITs), ETFs (including leveraged, inverse, and leveraged inverse), real estate investment trusts (REITs), direct participation programs, and cash. Additionally, PFA may utilize Structured Products. REITs, direct participation programs, and Structured Products are generally illiquid and cannot be traded and have additional risks. It is important to carefully read the risks outlined under Item 8 below and in the offering memorandum documents. Additionally, PFA works with First Trust and other financial companies to design and create Structured Products. The products created may cost more or less than other

products and there may be other structure products available at a lower cost or more suitable. However, PFA utilizes the securities when appropriate to diversify the portfolio.

Clients wanting to engage PFA to manage or monitor client's account will need to establish an account ("Account") through Independent Financial Group, LLC, Pershing, LLC, TD Ameritrade Institutional, or Charles Schwab & Co., Inc. ("Schwab"). Custodial services for the managed Account will be provided through Pershing, LLC, TD Ameritrade Institutional, or Charles Schwab & Co., Inc. ("Schwab") (hereinafter referred to as "the custodian").

If the account is opened with securities previously purchased through Independent Financial Group, LLC ("IFG") or a PFA Advisory Representative, IFG and the Advisory Representative may have already received commissions on the purchase. If the account is opened with cash proceeds from the sale of securities purchased through IFG or the Advisory Representative, IFG and/or the Advisory Representative may already have received commissions on the sale.

Please refer to Item 12 for information about custodial and brokerage services and options.

#### "Signature Service"

In addition to asset management, at PFA's discretion, PFA will agree to pay a portion of the preparation fees for preparation of US personal federal tax returns if all of the client's US assets under management are managed by PFA. If the client has a portion of their assets with another representative or adviser, PFA will only pay a portion of the tax preparation fee.

### **Financial Planning Services**

PFA offers financial, estate, tax, and retirement planning services. PFA will schedule a meeting with you and present the analysis of your situation and recommendations for steps to be taken to assist you to work toward financial goals.

Plans are based on your financial situation at the time and are based on financial information disclosed by you to PFA. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. PFA cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify PFA promptly of the changes. You are advised that the advice offered by PFA may be limited and is not meant to be comprehensive. Therefore, you may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

You are not obligated to implement advice through PFA or Advisory Representatives. Should you implement the plan with PFA's Advisory Representatives commissions or other compensation may be received in addition to the advisory fee paid to PFA.

**General Information**

You are advised the investment recommendations and advice offered by PFA are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform PFA promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify PFA of any such changes could result in investment recommendations not meeting your needs.

**Item 5 - FEES AND COMPENSATION**

Clients should refer to Item 12, Brokerage Practices, and Item 14, Client Referrals and Other Compensation.

**Asset Management Services**

- A. Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds.

You may make additions to the Account or withdrawals from the Account, provided the Account continues to meet minimum account size requirements. No fee adjustments will be made for additional deposits to the account or partial withdrawals from the account or for Account appreciation or depreciation.

As stated under Item 4.D above, PFA’s asset management program is offered as a wrap program (bundled program) and non-wrap program (unbundled), depending on the account custodian selected. Accounts maintained at Schwab, the advisory fee a client will pay will cover PFA’s advisory services and for custody and execution services.

<b>Account Size</b>	<b>Annual Wrap Annual Fee*</b>	<b>Non-Wrap Annual Fee**</b>
First \$5,000,000	1.10%	1.00%
Over \$5,000,000	Negotiable	Negotiable

\*Wrap fee is only available to accounts custodied at Schwab.

\*\*In addition to PFA’s fee, client will pay transaction charges and all other fees and expenses of maintaining the account.

PFA aggregates or households all of your managed accounts together to determine your quarterly fee.

PFA may change the above fee schedule upon 30-days prior written notice to you.

- B. Advisory fees will generally be collected directly from your account, provided you have given PFA written authorization. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not contain sufficient funds to pay advisory fees, PFA has limited authority to sell or redeem



securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to PFA, except for ERISA and IRA accounts.

- C. In addition to the advisory fees above, you may pay fees for account maintenance fees and other fees associated with maintaining the Account. Such fees are not charged by PFA and are charged by the product, broker/dealer or account custodian. PFA does not share in any portion of such fees. Additionally, you may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such advisory fees are not shared with PFA and are compensation to the fund-manager.

Additionally, accounts custodied at TD Ameritrade Institutional will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule and custodial fees.

At PFA's discretion, PFA may agree to cover on behalf of the client wire fees the client's bank charges for wiring funds.

- D. Advisory fees will be charged in advance of each calendar quarter based upon the value of the portfolio on the last business day of the just completed calendar quarter.

The initial advisory fee for accounts established during a calendar quarter will be charged the first full calendar quarter. Therefore, accounts established during a calendar will not be charged a prorated fee. Thereafter, client will be charged on a calendar quarter cycle in advance based on the value of the account on the last business day of the calendar quarter. Advisory fees for Accounts opened on a day other than the first day of the calendar quarter or closed on a day other than the last business day of the calendar quarter will be prorated based on the number of days remaining in the quarter.

#### Fees We Pay Schwab

In addition to compensating us for our portfolio management and advisory services, the wrap fees you pay us also allow us to pay Schwab for the brokerage services it provides to you, as described above, as well as additional services Schwab provides us, as described below. The fees we pay Schwab consist primarily of asset-based fees assessed on the total assets (including stocks, bonds, mutual funds, and cash) in all of our clients' accounts in our wrap fee program that are maintained at Schwab. Subject to an annual minimum fee of \$25,000, the asset-based fee is not greater than 17 basis points (0.17%) of the value of the assets in your account(s) at Schwab, along with the accounts of our other clients participating in this wrap fee program.

In addition to the asset-based fee described above, we pay Schwab certain other fees that it would otherwise charge you. These fee may include (a) flat dollar per trade fees for Schwab's prime brokerage and trade away services (through which we can have trades for your account at Schwab executed by broker-dealers other than Schwab), (b) custody and setup fees for alternative investments (such as non-standard assets, non-publically traded limited partnership interests, foreign securities, non-marketable securities, etc.).

## Plotkin Financial Advisors, LLC

The fees we pay Schwab may be more than what we would pay solely for Schwab's brokerage services.

- E. Advisory Representatives of PFA are dually registered representatives of Independent Financial Group, LLC ("IFG"), a registered broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and SIPC. Advisory Representatives of PFA who are Registered Representative receive trail commissions (i.e. 12b-1 fees) for a period of time as a result of directing securities transactions through IFG. Certain load and no-load mutual funds pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. 12b-1 fees are initially paid to IFG and a portion passed to the Advisory Representatives. The receipt of such fees represent an incentive for the Advisory Representatives to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

You may purchase the securities recommended by PFA directly or through other brokers or agents not affiliated with PFA.

These practices present a conflict of interest and give PFA an incentive to recommend investment products based on the compensation received, rather than on a client's needs. PFA will attempt to mitigate conflicts of interest by:

- Informing you of conflict of interest in this Disclosure Brochure.
- Maintaining and abiding by our Code of Ethics which requires us to place your interest first and foremost.
- Routine review of transactions
- Advising you of the right to decline to implement our recommendations and the right to choose other financial professionals for implementation.
- Recognizing and advising you PFA is a fiduciary and has an obligation to conduct its business in the best interest of its clients and not in PFA's interest.

### Termination Provisions

You may terminate investment advisory services obtained from PFA, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with PFA. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account. Thereafter, you may terminate investment advisory services upon delivery of your notice to terminate to PFA. Should you terminate investment advisory services during a calendar quarter, you will be issued a pro-rated refund of the advisory fee from the date of termination to the end of the calendar quarter.

### **Financial Planning Services**

Fees for financial planning services are covered by the fees under the asset management program described above. Therefore, PFA does not charge additional fees for financial planning services.

## **Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT**

This section is not applicable to PFA since PFA does not charge performance based fees.

## **Item 7 - TYPES OF CLIENTS**

PFA's services are geared toward both high net worth individuals (i.e. clients with a net worth of at least \$2,000,000, exclusive of primary residence or has at least \$1,000,000 under management with PFA) and other than high net worth individuals. Additionally, PFA provides services to pension and profit sharing plans.

PFA generally requires a minimum amount of assets be deposited to an account for the purpose of obtaining asset management services. PFA will generally require clients to deposit a minimum of \$500,000 (cash or securities) to brokerage accounts in order to participate in investment advisory services offered by PFA. The minimum accounts size requirement of \$500,000 is based on an aggregated account value of accounts under management with PFA. However, under certain circumstances, PFA may waive the minimum account size requirement and accept accounts less than \$500,000. Such circumstances may include but not be limited to additional assets will soon be deposited or client has other accounts with PFA. Clients are advised that performance may suffer due to difficulties with diversifying smaller accounts and due to risk controls potentially being compromised.

## **Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

- A. PFA conducts a variety of analyses to determine the portfolio allocations and holdings. PFA conducts fundamental, technical and cyclical analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns. Cyclical analysis is attempting to determine the patterns of how the economy and/or the market affect a security and attempt to determine the highs and lows of the security.
- B. You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by PFA will require you to be prepared to bear the risk of loss and fluctuating performance.

PFA does not represent, warrant or imply that the services or methods of analysis used by PFA can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by PFA will provide a better return than other investment strategies.

- C. As stated above in Item 4, PFA uses a combination of various securities in clients' managed portfolios including stocks, bonds, unit investment trusts (UITs), ETFs, real estate investment trusts (REITs), direct participation programs, and cash.

UITs are a registered investment company that buys and holds a generally fixed income portfolio of stocks, bonds, or other securities. UITs have the following risks:

- UITs are not actively managed and do not sell securities in response to ordinary market fluctuations. Instead, securities will not usually be sold until termination, which could mean that the sale price of the trusts securities may not be the highest price at which these securities traded during the life of the trust.
- One of the most significant risks of a unit investment trust is that there is no fund manager to react to changing market conditions. If the stock market begins to fall, the value of the stock securities held within the unit trust will fall as well, potentially making the investment worth less than the original purchase price.

ETFs (including leveraged and leveraged inverse) trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index.

- Non-traditional ETFs are trading vehicles in which daily rebalancing and market volatility have a significant impact on the realized return.
- A significant amount of principal could be lost in these securities rapidly.
- Tax laws could change and affect the tax treatment of this investment.
- Leverage: The use of leverage in an investment portfolio can magnify any price movements, resulting in high volatility and potentially significant loss of principal.
- Tracking Risk: ETFs may not track the underlying Index due to imperfect correlation between the ETF's portfolio securities and those in the underlying Index, rounding prices, changes to the underlying Index and regulatory requirements. This risk is heightened during times of increased market volatility or other unusual market conditions. Tracking error also may result because the ETF incurs fees and expenses while the underlying Index does not.
- Volatility: Non-traditional ETFs are volatile and not suitable for all investors. Due to their volatile nature.
- Holding Period: Positions in non-traditional ETFs should be monitored closely due to their volatile nature and inability to track the underlying index over an extended period of time. Non-traditional ETFs are not intended to be held long term. ETFs over a period longer than one day can differ significantly from their stated performance objectives.
- Liquidity: Some ETFs are be thinly traded which could impact the ability to sell shares quickly.
- Counterparty Risk: Non-traditional ETFs and futures-linked ETFs may enter into total return swaps with a counterparty. If the counterparty becomes unable to deliver its share of the contract, it will default on the swap, therefore negatively affecting the value of the non-traditional ETF
- Non-traditional ETFs are not suitable for most investors. The effects of mathematical compounding can grow significantly over time, leading to scenarios whereby performance over the long run can differ significantly from the performance (or inverse

performance) of their underlying index or benchmark during the same period of time. Leveraged, inverse, and leveraged inverse ETFs are more volatile and risky than traditional ETFs due to their exposure to leverage and derivatives, particularly total return swaps and futures. In addition, these instruments are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis. Holding leveraged, inverse, and leveraged inverse ETFs for longer periods of time potentially increases their risk due to the effects of compounding and the inherent difficulty in market timing.

- Traditional ETFs are generally not actively managed. This means that securities in the portfolio will not be purchased or sold in attempt to take advantage of changing market conditions. A traditional ETF may continue to hold securities even though their market value and dividend yields may have changed. An ETF generally carries the same investment risk as the portfolio of securities within the ETF. Securities in a portfolio may depreciate, and the ETF may not achieve its intended objective. In addition, each ETF is subject to specific risks that vary depending on each ETF's investment objectives and portfolio composition. Additionally, while premiums and discounts from net asset value ("NAV") are generally small among ETFs, there is a potential for severe dislocation from NAV.

Alternative Investments and Structured Products risks include:

- No readily available market for liquidation, therefore generally illiquid
- Not listed on any securities exchange and there may not be a secondary market in which to sell the security
- Significant market value fluctuations
- Potential loss of principal
- Long term investments that could range to 20 years
- Unpredictable return of investment, payment of interest or dividends
- Difficulty in ascertaining an accurate value
- Complex products and can be expensive
- Structured products often have credit and call risks
- Tax treatment can be complicated

The risks with stocks are that their prices fluctuate throughout the day. Stocks can drop in value and become worthless. The risks with stocks are market risk and company specific risk. The price of a stock can decline due to company-specific reasons as well as the health of the overall stock market. Even dividends, which many beginning investors believe are guaranteed payments by the company, can decline or be totally eliminated.

Investing in fixed income securities involves special risks not typically associated with equity securities. These risks include inflation rate risk, credit risk, which is the risk of potential loss due to the inability to meet contractual debt obligations, and interest rate risk, which is the risk that an investment's value will change due to a change in the level of interest rates. Additionally, there is an inverse relationship between bond prices and interest rates specific to fixed income securities. As interest rates rise, bond prices fall and, conversely, as interest rates fall, bond prices rise.

In instances where we recommend that a third party manage your assets, please refer to the third party's Form ADV brochure and associated disclosure documents for details on their investment strategies, methods of analysis and associated risks.

These are some of the primary risks associated with the way we recommend investments to you, please do not hesitate to contact us to discuss these risks and others in more detail.

No investment strategy can avoid loss. Investing in securities involves risk of loss that you need to be prepared to bear.

## **Item 9 - DISCIPLINARY INFORMATION**

There is no reportable disciplinary information required for PFA or its management persons that is material to your evaluation of PFA, its business or its management persons.

## **Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

- A. As previously stated, Advisory Representatives are dually registered as an advisory representative of PFA and as a registered representative of IFG. You are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan, commissions may be earned in addition to any fees paid for advisory services. Commissions may be higher or lower at IFG than at other broker/dealers. Advisory Representatives have a conflict of interest in having you purchase securities and/or insurance related products through IFG in that the higher their production with IFG the greater potential for obtaining a higher pay-out on commissions earned.

Under the rules and regulations of FINRA, IFG has an obligation to perform certain supervisory functions regarding certain activities engaged in by advisory representatives who are also registered representatives of IFG. For such supervisory functions, PFA pays IFG a portion of the advisory fees they receive. IFG and PFA are not affiliated.

- B-C. Monarch Global Partners, LLC is indirectly owned by Shimshon Plotkin, sole owner and advisory representative of PFA, and Ittai Dvir, an advisory representative of PFA. Monarch Global Partners, LLC is a company that acts as a marketing company on behalf of First Trust. Monarch Global Partners markets the First Trust exchange traded funds to citizens of Israel and potentially other non-US countries as approved by First Trust. Monarch Global Partners will be compensated for marketing services by receiving compensation from First Trust based on a percentage of the First Trust exchange traded fund sales to Israeli citizens or other non-US citizens. This is a conflict of interest to suggest First Trust exchange traded funds over other securities since Monarch will receive compensation as a result of sales in Israel. To mitigate this conflict of interest this disclosure is provided to you.

PFA is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing

entities. Further, PFA is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; insurance company or agency; pension consultant; or sponsor or syndicator of a limited partnership.

- D. PFA has recommended other investment advisers (i.e. third party managers) in the past and receives a portion of the fee charged to the client by the investment adviser. Since PFA has an interest in the compensation this is considered a material conflict of interest. PFA selected third party managers based on several criteria including cost, type of management, past history, ability to meet a need and provide a unique service. Since the fee charged is based on the value of your portfolio, all parties have an incentive to work toward performance goals and objectives. Consequently, if the third party manager does not adequately manage your account and the value of your portfolio goes down, so does the third party manager's and PFA's compensation.

The compensation paid to PFA by third party managers may vary. Thus, there is a conflict of interest to recommend a manager who shares a larger portion of its advisory fees over another manager. Additionally, the fees charged to clients utilizing a third party manager recommended by PFA are higher than if the client obtained services directly from the third party manager.

PFA attempts to mitigate the conflicts of interest (i.e. the potential receipt of commissions if recommendations are implemented) by providing you with these disclosures. Further, you are encouraged to consult other professionals and you may implement recommendations through other financial professionals. Furthermore, as a registered representative with IFG, Advisory Representatives are subject to a supervisory structure at IFG over their securities business.

## **Item 11 - CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **Code Of Ethics**

- A. PFA has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. PFA takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as PFA's policies and procedures. Further, PFA strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with PFA's Privacy Policy. As such, PFA maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, PFA's Code of Ethics establishes PFA's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

- B. Neither PFA nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.
- C. PFA and its associated persons buy or sell securities identical to those securities recommended to you. Therefore, PFA and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. PFA and its associated persons will not put their interests before your interest. PFA and its associated persons will not trade in a manipulative manner, in a way to harm clients, and/or in a way that violates insider trading policies.
- D. PFA is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

#### **Prohibition on Use of Insider Information**

PFA has adopted policies and procedures to prevent the misuse of “insider” information (i.e. material, non-public information). A copy of such policies and procedures is available to any person upon request.

#### **Item 12 - BROKERAGE PRACTICES**

As previously stated, Advisory Representatives are registered representatives of IFG. As a result they are subject to FINRA Conduct Rule 3040 which restricts them from conducting securities transactions away from IFG unless IFG provides them with written authorization. IFG prohibits PFA from directing trades to another broker/dealer other than TD Ameritrade and Schwab Institutional division of Charles Schwab & Co., Inc. (“Schwab”). Additionally, PFA has access to Pershing through Advisory Representative’s relationship with IFG.

PFA does not maintain custody of your assets that we manage, although we are deemed to have custody of your assets if you give us authority to withdraw assets from your 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 our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, or TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA (“TD Ameritrade”), an unaffiliated SEC-registered broker-dealer and FINRA member as the qualified custodians. We are independently owned and operated and is not affiliated with Schwab or TD Ameritrade. Schwab or TD Ameritrade will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab or TD Ameritrade as custodian/broker, you will decide whether to do so and will open your account with Schwab or TD Ameritrade 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. If you do not wish to place your assets with Schwab or TD Ameritrade, then we cannot manage your account.

PFA is independently owned and operated and not affiliated with IFG, Pershing, Schwab or TD Ameritrade.

Not all investment advisers require you to maintain accounts at a specific broker/dealer. You are advised you may maintain accounts at another broker/dealer and select a discount broker/dealer. However, the services offered by PFA will not be suitable and you will not be able to receive asset management services from PFA.

In initially selecting IFG and Schwab, PFA conducted due diligence. PFA's evaluation and criteria includes:

- Ability to service you
- Staying power as a company
- Industry reputation
- Ability to report to you and to PFA
- Availability of an efficient trading platform
- Products and services available
- Technology resources
- Educational resources
- Execution capability
- Financial responsibility and viability
- Confidentiality and security of your information
- Responsiveness
- Other factors that may bear on the overall evaluation of best price and execution

There is an incentive for PFA and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest.

#### TD Ameritrade

TD Ameritrade offers to independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. PFA receives some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure under Item 14. below.)

#### Schwab

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

Schwab Advisor 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 charge us quarterly service fees of \$1,200. 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.

*Services That May Not Directly Benefit You.*

Schwab also makes available to us other products and services that benefit us but do 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

*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
- Access to employee benefits providers, human capital consultants, and insurance providers

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 gives 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 and not Schwab's services that benefit only us.

#### Independent Financial Group, LLC

IFG has a wide range of approved securities products for which IFG performs due diligence prior to selection. IFG's registered representatives are required to adhere to these products when implementing securities transactions through IFG. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer. IFG also provides Advisory Representatives, and therefore the PFA, with back-office operational, technology, and other administrative support. Other services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help Advisory Representatives and PFA manage and further develop its business enterprise.

IFG and its clearing broker/dealer, Pershing, LLC also make available to PFA other products and services that benefit PFA but may not directly benefit you. Some of these other products and services assist PFA with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of PFA's accounts, including accounts not held through IFG. PFA receives a benefit because PFA does not have to produce or pay for the research, products or services. PFA has an incentive to select or recommend a broker-dealer based on PFA's interest in receiving the research or other products or services, rather than on our clients' interest in receiving most favorable execution.

#### Block or Trade Aggregation

When deemed appropriate, PFA aggregates ("bunches") transactions in the same security on behalf of more than one client in an effort to strive for best execution and to possibly reduce the price per share and/or other costs to clients. However, aggregated or bunched orders will not reduce the transaction costs to participating clients. PFA conducts aggregated transactions in a manner designed to ensure that no participating client is favored over another client. Participating clients will obtain the average price per share for the security executed that day. To the extent the aggregated order is not filled in its entirety and when possible, securities purchased or sold in an aggregated transaction will be allocated on a random basis. Under certain circumstances, the amount of securities may be increased or decreased to avoid holding odd-lot or a small number of shares for particular clients.

### **Item 13 - REVIEW OF ACCOUNTS**

- A. Clients will be invited to participate in at least an annual review. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. PFA will monitor for changes or shifts in the economy, changes to the management and structure of a company in which your assets are invested, and market shifts and corrections.

The following individuals conduct reviews:

Ittai Dvir, Advisory Representative  
Shimshon Plotkin, Advisory Representative  
Erich Imphong, Advisory Representative

- B. You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require a review of your portfolio allocation and recommendations for changes.
- C. You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian. At least annually when you attend the annual review, PFA will provide you with a consolidated report of your managed account. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail.

#### **Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION**

A. Schwab

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors 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.

TD Ameritrade

As disclosed under Item 12 above, PFA participates in TD Ameritrade's institutional customer program and PFA recommends TD Ameritrade to Clients for custody and brokerage services. There is no direct link between PFA's participation in the program and the investment advice it gives to its Clients, although PFA receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving PFA participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to PFA by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by PFA's related persons. Some of the products and services made available by TD Ameritrade through the program benefits PFA but does not benefit its Client accounts. These products or services may assist PFA in managing and administering Client accounts, including accounts not maintained at TD

Ameritrade. Other services made available by TD Ameritrade are intended to help PFA manage and further develop its business enterprise. The benefits received by PFA or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, PFA endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by PFA or its related persons in and of itself creates a potential conflict of interest and can indirectly influence the PFA's choice of TD Ameritrade for custody and brokerage services.

#### IFG

IFG offers incentives to attend certain conferences based on achieving production thresholds. There is no requirement to sell a certain product or amount of a specific product. Qualification for trips and conferences is based on overall production and meeting the production levels determined by IFG. If the thresholds are satisfied, IFG can cover certain travel and conference costs.

#### Other Product Vendors

Product vendors recommended by PFA provide monetary and non-monetary assistance with client events, provide educational tools and resources. PFA does not select products as a result of any monetary or non-monetary assistance. The selection of product that is in the client's best interest is first and foremost. PFA's due diligence of a product does not take into consideration any assistance it may receive. It is considered by regulators to be a conflict of interest for an investment adviser such as PFA to receive monetary and/or non-monetary assistance from product vendors even if for the direct or indirect benefit of the investment adviser's clients.

PFA has agreements with various alternative investment sponsors for exclusivity to offer alternative investment products to Israeli citizens.

**Additionally, many of the alternative investment sponsors pay an a marketing allowance to advisory representatives who are registered representatives for any units of the programs purchased by international investors. This is a conflict of interest. To help mitigate this conflict of interest, all sales of units of any alternative investment must flow through the broker/dealer with which the advisory representative is registered and the applications go through a suitability review.**

- B. Associated persons of PFA, either acting as associated persons of PFA or as registered representatives of Independent Financial Group, LLC, may from time to time interact with individuals ("Solicitors") in Israel for the purpose of referring clients. These dealings are subject to certain FINRA rules, as well as SEC rules governing investment advisers. PFA may enter into arrangements with Solicitors whereby the Solicitors will refer clients who may be a candidate for investment advisory services to PFA. In return, PFA will agree to compensate the Solicitor for the referral. Compensation to the Solicitor is dependent on the client entering into an advisory agreement with PFA for advisory services. Compensation to solicitor will be an agreed upon percentage of the total investment amount transferred or deposited to the custodian account and maintained in the account. The solicitation/referral fee is paid pursuant

to a written agreement retained by both the investment adviser and the Solicitor. The Solicitor will be required to provide the client with a copy of PFA's Disclosure Brochure and a Solicitor Disclosure prior to or at the time of entering into any investment advisory contract with PFA. Solicitor is not permitted to offer clients any investment advice on behalf of PFA. Clients' advisory fee will not be increased as a result of compensation being shared with Solicitor.

### **Item 15 - CUSTODY**

PFA is deemed to have custody under two circumstances. Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct your account custodian to deduct our advisory fees directly from your account. Additionally, PFA is deemed to have custody if a client has a standing letter of authorization (SLOA) to transfer funds or securities to a third party and PFA has the ability to direct transfers, change the amount, and/or the timing of the transfer. Your account custodian maintains actual custody of your assets. You will receive account statements directly from your account custodian at least quarterly. They will be sent to the email or postal mailing address you provided. You should carefully review those statements promptly when you receive them. Furthermore, clients should compare any statements or reports received from PFA with the statements received from the qualified custodian.

### **Item 16 - INVESTMENT DISCRETION**

You grant PFA authorization to manage your account on a discretionary basis by execution of the advisory agreement. Discretionary authority will give PFA the authority to buy, sell, exchange, convert securities in your managed accounts. Additionally, PFA will have the authority to determine the security, the amount of the transaction and the time of execution. You will grant such authority to PFA by execution of the advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice by PFA.

Additionally, you are advised that:

- 1) You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
- 3) PFA requires the use of the broker/dealer with which your Advisory Representative is registered for sales in commissionable alternative investment, mutual funds, and/or variable annuities, if you elect to implement recommendations through your Advisory Representative;
- 4) .

### **Item 17 - VOTING CLIENT SECURITIES**

PFA does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact PFA about questions you may have and for opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

**Item 18 - FINANCIAL INFORMATION**

- A. PFA will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service.
- B. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.
- C. Neither PFA nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

Item 1 – Cover Page  
**Part 2A Appendix 1**

**Plotkin Financial Advisors, LLC**  
**8401 Connecticut Avenue, Suite 400**  
**Chevy Chase, MD 20815**  
**P: 301-907-9790**  
**[www.pfallc.com](http://www.pfallc.com)**

**March 2018**

**This wrap fee program brochure provides information about the qualifications and business practices of Plotkin Financial Advisors, LLC. If you have any questions about the contents of this Brochure, please contact us at (301) 907-9790 and/or Sarah Hunt at [Shunt@pfallc.com](mailto:Shunt@pfallc.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 Plotkin Financial Advisors, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Any references to Plotkin Financial Advisors, LLC as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.**



## Item 2 - Material Changes

September 2017

Item 4 and Item 6 – Added disclosure about the use of structured products and added disclosure about the risks associated with structured products. Specifically, structured products have the following risks:

Alternative Investments and Structured Products risks include:

- No readily available market for liquidation, therefore generally illiquid
- Not listed on any securities exchange and there may not be a secondary market in which to sell the security
- Significant market value fluctuations
- Potential loss of principal
- Long term investments that could range to 20 years
- Unpredictable return of investment, payment of interest or dividends
- Difficulty in ascertaining an accurate value
- Complex products and can be expensive
- Structured products often have credit and call risks
- Tax treatment can be complicated

June 2017

Item 9 under the heading Other Financial Industry Activities and Affiliations added disclosure about Monarch Global Partners, LLC is indirectly owned by Shimshon Plotkin, sole owner and advisory representative of PFA, and Ittai Dvir, an advisory representative of PFA. Monarch Global Partners, LLC is a company that acts as a marketing company on behalf of First Trust. Monarch Global Partners markets the First Trust exchange traded funds to citizens of Israel and potentially other non-US countries as approved by First Trust. Monarch Global Partners will be compensated for marketing services by receiving compensation from First Trust based on a percentage of the First Trust exchange traded fund sales to Israeli citizens or other non-US citizens. This is a conflict of interest to suggest First Trust exchange traded funds over other securities since Monarch will receive compensation as a result of sales in Israel. To mitigate this conflict of interest this disclosure is provided to you.

\*\*\*\*\*

At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes.

The material changes discussed above are only those changes that have been made to this brochure since the firm's last annual update of the brochure. The date of the last annual update of the brochure was March 2018.

Pursuant to SEC 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 fiscal year, which is December 31st. We may further provide other ongoing disclosure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on change or new information, at any time, without charge.

## Plotkin Financial Advisors, LLC

Our brochure may be requested free of charge by contacting Sarah Hunt at (301) 907-9790 and/or at [shunt@pfallc.com](mailto:shunt@pfallc.com). Additional information about Plotkin Financial Advisors, LLC is also available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The website also provides information about any persons affiliated with Plotkin Financial Advisors, LLC who are registered, or are required to be registered, as investment adviser representatives of Plotkin Financial Advisors, LLC.

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#### **Item 4 - Services, Fees and Compensation**

*Item 4.A – Describe the services, including the types of portfolio management services, provided under each program. Indicate the wrap fee charged for each program or, if fees vary according to a schedule, provide your fee schedule. Indicate whether fees are negotiable and identify the portion of the total fee, or the range of fees, paid to portfolio managers.*

PFA customizes your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time and your financial situation, goals and objectives. PFA manages your account either based on a model designed by PFA and utilized with other clients or customizes your account around a model allocation. PFA's objective is to establish a suitable allocation for the client across all of a client's investment holdings in an attempt to reduce risk and market volatility.

PFA will schedule a meeting with you and present the recommended portfolio allocation. Upon your approval, PFA will implement the portfolio allocation. PFA will provide continuous and ongoing management of your account.

Each client's portfolio is customized to the client. PFA will examine a client's entire investment portfolio, including taking into consideration the client's employer retirement accounts, if possible, and design an asset allocation specific to the client based on the client's objectives, risk tolerance, time horizon and investment goals. Client's portfolios may be similar or dissimilar depending on investment objectives and goals, timing of investment and client investment sophistication.

PFA offers asset management services on a discretionary and nondiscretionary basis. If you grant PFA discretionary authority, PFA will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you. PFA may actively trade securities and hold such holdings for periods of 30 days or less or maintain positions for longer or shorter term periods. Discretionary authority will be granted by you to PFA by execution of the Investment Advisory Agreement. If you elect to have your accounts managed on a nondiscretionary basis, no changes will be made to the allocation of your account without prior consultation with you and your expressed agreement.

Client's portfolio may consist of stocks, bonds, unit investment trusts (UITs), ETFs (including leveraged, inverse, and leveraged inverse), real estate investment trusts (REITs), direct participation programs, and cash. Additionally, PFA may utilize Structured Products. REITs, direct participation programs, and Structured Products are generally illiquid and cannot be traded and have additional risks. It is important to carefully read the risks outlined under Item 8 below and in the offering memorandum documents. Additionally, PFA works with First Trust and other financial companies to design and create Structured Products. The products created may cost more or less than other products and there may be other structure products available at a lower cost or more suitable. However, PFA utilizes the securities when appropriate to diversify the portfolio.

Transactions in the account, account reallocations and rebalancing trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

**Schwab's Brokerage Services**

In addition to the foregoing portfolio management, the program includes brokerage services of Charles Schwab & Co., Inc. ("Schwab"), a broker/dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. Plotkin Financial Advisors is independently owned and operated and is not affiliated with Schwab. Schwab will act solely as a broker/dealer and not as an investment adviser to you. It will have no discretion over your account and will act solely on instructions it receives from us or you. Schwab has no responsibility for our services and undertakes not duty to you to monitor our management of your account or other services we provide to you. Schwab will hold your assets in a brokerage account and buy and sell securities and execute other transactions when we or you instruct them to. While we recommend that you use Schwab as custodian/broker to participate in our program, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you. If you do not wish to place your assets with Schwab, then we cannot manage your account in the program. Not all advisers require their clients to use a particular broker/dealer or other custodian selected by the adviser. Even through your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below.

**Fees and Termination Provisions**

**Our Fees**

Because our wrap fees are not tied to an account's frequency of trading and apply generally to all assets in the account, this fee arrangement is not appropriate for all accounts. For example, a wrap fee arrangement would not be appropriate for an account that holds primarily cash and cash equivalents, fixed income securities or non-transaction-fee mutual funds for a substantial period of time.

Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds.

You may make additions to the Account or withdrawals from the Account, provided the Account continues to meet minimum account size requirements. No fee adjustments will be made for additional deposits to the account or partial withdrawals from the account or for Account appreciation or depreciation.

<b>Account Size</b>	<b>Annual Fee</b>
First \$5,000,000	1.10%
Over \$5,000,000	Negotiable

PFA aggregates or households all of your managed accounts together to determine your quarterly fee.

PFA may change the above fee schedule upon 30-days prior written notice to you.

**"Signature Service"**

In addition to asset management, at PFA's discretion, PFA will agree to pay a portion of the preparation fees for preparation of US personal federal tax returns if all of the client's US assets under

management are managed by PFA. If the client has a portion of their assets with another representative or adviser, PFA will only pay a portion of the tax preparation fee.

Advisory fees will generally be collected directly from your account, provided you have given PFA written authorization. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not contain sufficient funds to pay advisory fees, PFA has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to PFA, except for ERISA and IRA accounts.

Advisory fees will be charged in advance of each calendar quarter based upon the value of the portfolio on the last business day of the just completed calendar quarter.

The initial advisory fee for accounts established during a calendar quarter will be charged the first full calendar quarter. Therefore, accounts established during a calendar will not be charged a prorated fee. Thereafter, client will be charged on a calendar quarter cycle in advance based on the value of the account on the last business day of the calendar quarter. Advisory fees for Accounts opened on a day other than the first day of the calendar quarter or closed on a day other than the last business day of the calendar quarter will be prorated based on the number of days remaining in the quarter.

#### Fees We Pay Schwab

In addition to compensating us for our portfolio management and advisory services, the wrap fees you pay us also allow us to pay Schwab for the brokerage services it provides to you, as described above, as well as additional services Schwab provides us, as described below. The fees we pay Schwab consist primarily of asset-based fees assessed on the total assets (including stocks, bonds, mutual funds, and cash) in all of our clients' accounts in our wrap fee program that are maintained at Schwab. Subject to an annual minimum fee of \$25,000, the asset-based fee is not greater than 17 basis points (0.17%) of the value of the assets in your account(s) at Schwab, along with the accounts of our other clients participating in this wrap fee program.

In addition to the asset-based fee described above, we pay Schwab certain other fees that it would otherwise charge you. These fees may include (a) flat dollar per trade fees for Schwab's prime brokerage and trade away services (through which we can have trades for your account at Schwab executed by broker-dealers other than Schwab), (b) custody and setup fees for alternative investments (such as non-standard assets, non-publically traded limited partnership interests, foreign securities, non-marketable securities, etc.).

The fees we pay Schwab may be more than what we would pay solely for Schwab's brokerage services.

#### Termination Provisions

You may terminate investment advisory services obtained from PFA, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with PFA. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such Account maintenance fees. Thereafter, you may terminate investment advisory services upon delivery of your notice to terminate to PFA. Should you terminate investment advisory services during

a calendar quarter, you will be issued a pro-rated refund of the advisory fee from the date of termination to the end of the calendar quarter.

*Item 4.B - Explain that the program may cost the client more or less than purchasing such services separately and describe the factors that bear upon the relative cost of the program, such as the cost of the services if provided separately and the trading activity in the client's account.*

#### Relative Cost of Our Wrap Fee Program to You

The program may cost you more or less than purchasing our investment advice and Schwab's brokerage services separately. The relative cost of our wrap fee program to you is influenced by various factors, including the cost of our investment advice and Schwab's brokerage services if you purchased them separately, the types of investments held in your account, and the frequency and size of trades we make for your account. For example, if the number of transactions in your account is low enough, the wrap fee you pay us may exceed the stand alone investment advisory fee and separate brokerage commissions that you otherwise would have paid. In addition, because the fees we pay Schwab which comprise a portion of the wrap fee you pay us (i) are generally not tied to the number of trades made and (ii) are based on the total assets of all of our clients accounts in our wrap fee program and custodied at Schwab, client accounts that have relatively few assets but that trade relatively frequently could disproportionately benefit from the program compared to larger accounts that trade less frequently.

Wrap accounts may be more suitable for the client who wants the cost of management and trading in one single fee without being charged for each transaction. While a non-wrap account will be more suitable for a client who prefers to separate management fees and pay for each transaction. Actively managed accounts will generally be better suited for a wrap account. Managed accounts that are infrequently traded or trade in no-transaction fee securities will be better suited for a non-wrap fee structure. A wrap program may cost you more or less than if you purchased advisory and transactional services separately.

*Item 4.C - Describe any fees that the client may pay in addition to the wrap fee, and describe the circumstances under which clients may pay these fees, including, if applicable, mutual fund expenses and mark-ups, mark-downs, or spreads paid to market makers.*

#### Additional Fees and Costs You May Pay

Our wrap fee does not cover the fees and costs listed below, which may apply to assets in your enrolled account to which our wrap fee also applies, and to transactions in your account.

- You may pay fees for account maintenance fees and other fees associated with maintaining the Account. Such fees are not charged by PFA and are charged by the product, broker/dealer or account custodian. At PFA's discretion, PFA may agree to cover on behalf of the client wire fees the client's bank charges for wiring funds.
- Commissions and other fees for services provided by broker-dealers other than Schwab for transactions executed or effected by or through them that settle into or from your account at Schwab such as through our use of Schwab's Prime Brokerage or Trade Away Services. You will be responsible for paying any commissions and other fees or compensation charged by broker-dealers other than Schwab. Because you will pay our wrap fee in addition to any commissions and/or other charges paid to broker-dealers other than Schwab who execute transactions for your account, we may have an incentive to execute transactions for your

accounts through Schwab, and this incentive could, in some circumstances, conflict with our duty to seek best execution.

- You may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such advisory fees are not shared with PFA and are compensation to the fund-manager.
- Fees charged by mutual fund companies, unit investment trusts (UITs), closed-end funds and other collective investment vehicles, including, but not limited to sales loads (a portion of which are paid to Schwab) and/or charges and short-term redemption fees.
- Markups and markdowns, bid-ask spreads, selling concessions and the like received by Schwab in connection with transactions it executes as principal by selling or buying securities to or from you for its own account. Principal transactions contracts with those in which Schwab acts as your agent in effecting trades between you and a third party. Schwab may make a profit or incur a loss on trades in which it acts as principal. Markups and markdowns and bid-ask spreads are not separate fees, but rather are reflected in the net price at which a trade order is executed.
- Transfer taxes, odd-lot differentials, certificate delivery fees, reorganization fees, fees required by law, and any other fees or charges similar to those described above.

A complete list of Schwab's charges and fees is contained in the *Charles Schwab Institutional Pricing Guide*, which you will receive promptly following the opening of your account with Schwab. PFA will cover all administrative fees, provided not prohibited by any rules or regulations to which PFA is subject.

PFA does not share in any portion of the fees.

Item 4.D – If the person recommending the wrap fee program to the client receives compensation as a result of the client's participation in the program, disclose this fact. Explain, if applicable, that the amount of this compensation may be more than what the person would receive if the client participated in your other programs or paid separately for investment advice, brokerage, and other services. Explain that the person, therefore, may have a financial incentive to recommend the wrap fee program over other programs or services.

#### Additional Compensation We Receive

We may receive more compensation from your participation in our wrap fee program than if you purchased our investment advisory services and Schwab's (or another broker/custodian's) services separately.

These practices and our arrangement with Schwab present a conflict of interest and give PFA an incentive to recommend our services and Schwab's services, regardless of a client's needs. PFA will attempt to mitigate conflicts of interest by:

- Informing you of conflict of interest in this Disclosure Brochure.
- Maintaining and abiding by our Code of Ethics which requires us to place your interest first and foremost.
- Routine review of transactions and our relationship with the broker/custodian
- Advising you of the right to decline to implement our recommendations and the right to choose other financial professionals for implementation.



- Recognizing and advising you PFA is a fiduciary and has an obligation to conduct its business in the best interest of its clients and not in PFA's interest.

### **Item 5 - Account Requirements and Types of Clients**

PFA's services are geared toward both high net worth individuals (i.e. clients with a net worth of at least \$2,000,000, exclusive of primary residence or has at least \$1,000,000 under management with PFA) and other than high net worth individuals. Additionally, PFA provides services to pension and profit sharing plans.

PFA generally requires a minimum amount of assets be deposited to an account for the purpose of obtaining asset management services. PFA will generally require clients to deposit a minimum of \$500,000 (cash or securities) to brokerage accounts in order to participate in investment advisory services offered by PFA. The minimum accounts size requirement of \$500,000 is based on an aggregated account value of accounts under management with PFA. However, under certain circumstances, PFA may waive the minimum account size requirement and accept accounts less than \$500,000. Such circumstances may include but not be limited to additional assets will soon be deposited or client has other accounts with PFA. Clients are advised that performance may suffer due to difficulties with diversifying smaller accounts and due to risk controls potentially being compromised.

### **Item 6 - Portfolio Manager Selection and Evaluation**

Portfolio management and asset allocation is determined and provided by advisory representatives of PFA: Ittai Dvir, Shimshon Plotkin Shimshon Plotkin, Ittai Dvir, and Erich Imphong. PFA does not engage third party managers to manage a portion of your assets within the wrap account. PFA determines the securities and the allocation of your managed account. No one person solely makes investment decisions. Investment decisions are made as a group based on research and discussion.

In addition to the asset management wrap program, PFA offers Financial Planning Services.

PFA tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities. PFA follows an eight step process in providing its services:

1. Listen to your goals and objectives
2. Review your current financial and investment situation.
3. Discuss issues relevant to your financial goals including retirement, cash flow needs, disposition of assets at death, expectations about returns, feels about risk tolerance, and expectations about the relationship with PFA
4. Evaluate your current investment strategy
5. Develop recommendations including investment strategies, asset allocation, insurance (life, disability, long-term care), and estate planning
6. Present your financial plan
7. Implementation
8. Ongoing and continuous monitoring

PFA will conduct a series of meetings with you to obtain information about your financial situation. Depending on the services you have requested, PFA will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Financial needs
- Cash flow analysis
- Cost of living needs
- Education needs
- Savings tendencies
- Other applicable financial information required by PFA in order to provide the investment advisory services requested.

PFA conducts a variety of analyses to determine the portfolio allocations and holdings. PFA conducts fundamental, technical and cyclical analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns. Cyclical analysis is attempting to determine the patterns of how the economy and/or the market affect a security and attempt to determine the highs and lows of the security.

Investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by PFA will require you to be prepared to bear the risk of loss and fluctuating performance.

PFA does not represent, warrant or imply that the services or methods of analysis used by PFA can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by PFA will provide a better return than other investment strategies.

As stated above in Item 4, PFA uses a combination of various securities in clients' managed portfolios including stocks, bonds, unit investment trusts (UITs), ETFs (including leveraged, leveraged inverse and inverse), real estate investment trusts (REITs), closed end funds, direct participation programs, and cash.

UITs are a registered investment company that buys and holds a generally fixed income portfolio of stocks, bonds, or other securities. UITs have the following risks:

- UITs are not actively managed and do not sell securities in response to ordinary market fluctuations. Instead, securities will not usually be sold until termination, which could mean that the sale price of the trusts securities may not be the highest price at which these securities traded during the life of the trust.

- One of the most significant risks of a unit investment trust is that there is no fund manager to react to changing market conditions. If the stock market begins to fall, the value of the stock securities held within the unit trust will fall as well, potentially making the investment worth less than the original purchase price.

ETFs (including leveraged, leveraged inverse and inverse) trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index.

- Non-traditional ETFs are trading vehicles in which daily rebalancing and market volatility have a significant impact on the realized return.
- A significant amount of principal could be lost in these securities rapidly.
- Tax laws could change and affect the tax treatment of this investment.
- Leverage: The use of leverage in an investment portfolio can magnify any price movements, resulting in high volatility and potentially significant loss of principal.
- Tracking Risk: ETFs may not track the underlying Index due to imperfect correlation between the ETF's portfolio securities and those in the underlying Index, rounding prices, changes to the underlying Index and regulatory requirements. This risk is heightened during times of increased market volatility or other unusual market conditions. Tracking error also may result because the ETF incurs fees and expenses while the underlying Index does not.
- Volatility: Non-traditional ETFs are volatile and not suitable for all investors. Due to their volatile nature.
- Holding Period: Positions in non-traditional ETFs should be monitored closely due to their volatile nature and inability to track the underlying index over an extended period of time. Non-traditional ETFs are not intended to be held long term. ETFs over a period longer than one day can differ significantly from their stated performance objectives.
- Liquidity: Some ETFs are thinly traded which could impact the ability to sell shares quickly.
- Counterparty Risk: Non-traditional ETFs and futures-linked ETFs may enter into total return swaps with a counterparty. If the counterparty becomes unable to deliver its share of the contract, it will default on the swap, therefore negatively affecting the value of the non-traditional ETF
- Non-traditional ETFs are not suitable for most investors. The effects of mathematical compounding can grow significantly over time, leading to scenarios whereby performance over the long run can differ significantly from the performance (or inverse performance) of their underlying index or benchmark during the same period of time. Leveraged, inverse, and leveraged inverse ETFs are more volatile and risky than traditional ETFs due to their exposure to leverage and derivatives, particularly total return swaps and futures. In addition, these instruments are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis. Holding leveraged, inverse, and leveraged inverse ETFs for longer periods of time potentially increases their risk due to the effects of compounding and the inherent difficulty in market timing.
- Traditional ETFs are generally not actively managed. This means that securities in the portfolio will not be purchased or sold in attempt to take advantage of changing market conditions. A traditional ETF may continue to hold securities even though their market

value and dividend yields may have changed. An ETF generally carries the same investment risk as the portfolio of securities within the ETF. Securities in a portfolio may depreciate, and the ETF may not achieve its intended objective. In addition, each ETF is subject to specific risks that vary depending on each ETF's investment objectives and portfolio composition. Additionally, while premiums and discounts from net asset value ("NAV") are generally small among ETFs, there is a potential for severe dislocation from NAV.

Alternative Investments and Structured Products risks include:

- No readily available market for liquidation, therefore generally illiquid
- Not listed on any securities exchange and there may not be a secondary market in which to sell the security
- Significant market value fluctuations
- Potential loss of principal
- Long term investments that could range to 20 years
- Unpredictable return of investment, payment of interest or dividends
- Difficulty in ascertaining an accurate value
- Complex products and can be expensive
- Structured products often have credit and call risks
- Tax treatment can be complicated

The risks with stocks are that their prices fluctuate throughout the day. Stocks can drop in value and become worthless. The risks with stocks are market risk and company specific risk. The price of a stock can decline due to company-specific reasons as well as the health of the overall stock market. Even dividends, which many beginning investors believe are guaranteed payments by the company, can decline or be totally eliminated.

Investing in fixed income securities involves special risks not typically associated with equity securities. These risks include inflation rate risk, credit risk, which is the risk of potential loss due to the inability to meet contractual debt obligations, and interest rate risk, which is the risk that an investment's value will change due to a change in the level of interest rates. Additionally, there is an inverse relationship between bond prices and interest rates specific to fixed income securities. As interest rates rise, bond prices fall and, conversely, as interest rates fall, bond prices rise.

In instances where we recommend that a third party manage your assets, please refer to the third party's Form ADV brochure and associated disclosure documents for details on their investment strategies, methods of analysis and associated risks.

These are some of the primary risks associated with the way we recommend investments to you, please do not hesitate to contact us to discuss these risks and others in more detail.

No investment strategy can avoid loss. Investing in securities involves risk of loss that you need to be prepared to bear.

PFA does not charge performance based fees.

PFA does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact PFA about questions you may have and for opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

### **Item 7 - Client Information Provided to Portfolio Managers**

Your financial history and information and personal information such as social security number, identify verification information, account numbers, etc. will be gathered and obtained by your Advisory Representative. The aforementioned information will be communicated as required to the account custodian you select to establish your account. Your non-public information will not be disclosed to any third party unless required by law or to provide you the services you have requested.

### **Item 8 - Client Contact with Portfolio Managers**

There are no restrictions or limitations on your ability to contact your Advisory Representative or any member of the PFA management team. You along with your Advisory Representative determine the frequency of meetings and reviews.

### **Item 9 - Additional Information**

#### **Disciplinary Information**

There is no reportable disciplinary information required for PFA or its advisory representative that would be deemed material to your evaluation of the advisory services offered by PFA or the integrity of PFA, its principal owners or your Advisory Representative.

#### **Other Financial Industry Activities and Affiliations**

Advisory Representatives are dually registered as an advisory representative of PFA and as a registered representative of Independent Financial Group, LLC (“IFG”). You are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan, commissions may be earned in addition to any fees paid for advisory services. Commissions may be higher or lower at IFG than at other broker/dealers. Advisory Representatives have a conflict of interest in having you purchase securities and/or insurance related products through IFG in that the higher their production with IFG the greater potential for obtaining a higher pay-out on commissions earned.

Under the rules and regulations of FINRA, IFG has an obligation to perform certain supervisory functions regarding certain activities engaged in by advisory representatives who are also registered representatives of IFG. For such supervisory functions, PFA pays IFG a portion of the advisory fees they receive. IFG and PFA are not affiliated.

Monarch Global Partners, LLC is indirectly owned by Shimshon Plotkin, sole owner and advisory representative of PFA, and Ittai Dvir, an advisory representative of PFA. Monarch Global Partners, LLC is a company that acts as a marketing company on behalf of First Trust. Monarch Global Partners markets the First Trust exchange traded funds to citizens of Israel and potentially other non-US countries as approved by First Trust. Monarch Global Partners will be compensated for marketing services by receiving compensation from First Trust based on a percentage of the First Trust exchange traded fund sales to Israeli citizens or other non-US citizens. This is a conflict of interest to suggest First Trust exchange traded funds over other securities since Monarch will receive compensation as a result of sales in Israel. To mitigate this conflict of interest this disclosure is provided to you.

PFA is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, PFA is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; insurance company or agency; pension consultant; or sponsor or syndicator of a limited partnership.

PFA attempts to mitigate the conflicts of interest (i.e. the potential receipt of commissions if recommendations are implemented) by providing you with these disclosures. Further, you are encouraged to consult other professionals and you may implement recommendations through other financial professionals. Furthermore, as a registered representative with IFG, Advisory Representatives are subject to a supervisory structure at IFG over their securities business.

## **Code of Ethics, Participation of Interest in Client Transactions and Personal Trading**

### **Code Of Ethics**

PFA has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. PFA takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as PFA's policies and procedures. Further, PFA strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with PFA's Privacy Policy. As such, PFA maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, PFA's Code of Ethics establishes PFA's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

Neither PFA nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.

PFA and its associated persons buy or sell securities identical to those securities recommended to you. Therefore, PFA and/or its associated persons have an interest or position in certain securities that are also recommended and bought or sold to you. PFA and its associated persons will not put their

interests before your interest. PFA and its associated persons will not trade in a manipulative manner, in a way to harm clients, and/or in a way that violates insider trading policies.

PFA is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

### **Prohibition on Use of Insider Information**

PFA has adopted policies and procedures to prevent the misuse of “insider” information (i.e. material, non-public information). A copy of such policies and procedures is available to any person upon request.

### **Review of Accounts**

You will be invited to participate in at least an annual review. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. PFA will monitor for changes or shifts in the economy, changes to the management and structure of a company in which your assets are invested, and market shifts and corrections.

The following individuals conduct reviews:

Ittai Dvir, Advisory Representative  
Shimshon Plotkin, Advisory Representative  
Erich Imphong, Advisory Representative

You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require a review of your portfolio allocation and recommendations for changes.

You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian. At least annually when you attend the annual review, PFA will provide you with a consolidated report of your managed account. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian’s report will prevail.

### **Client Referrals and Other Compensation**

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

Schwab Advisor 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 described below are generally 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 can charge us quarterly service fees of \$1,200. 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.

*Services That May Not Directly Benefit You.*

Schwab also makes available to us other products and services that benefit us but do 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

*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
- Access to employee benefits providers, human capital consultants, and insurance providers

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 gives 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 and not Schwab's services that benefit only us.

#### *Other Compensation from Vendors*

Product vendors recommended by PFA provide monetary and non-monetary assistance with client events, provide educational tools and resources. PFA does not select products as a result of any monetary or non-monetary assistance. The selection of product that is in the client's best interest is first and foremost. PFA's due diligence of a product does not take into consideration any assistance it receives. It is considered by regulators to be a conflict of interest for an investment adviser such as PFA to receive monetary and/or non-monetary assistance from product vendors even if for the direct or indirect benefit of the investment adviser's clients.

PFA has agreements with various alternative investment sponsors for exclusivity to offer alternative investment products to Israeli citizens. **Additionally, many of the alternative investment sponsors pay a marketing allowance to advisory representatives who are registered representatives for any units of the programs purchased by international investors. This is a conflict of interest. To help mitigate this conflict of interest, all sales of units of any alternative investment must flow through the broker/dealer with which the advisory representative is registered and the applications go through a suitability review.**

#### IFG

IFG offers incentives to attend certain conferences based on achieving production thresholds. There is no requirement to sell a certain product or amount of a specific product. Qualification for trips and conferences is based on overall production and meeting the production levels determined by IFG. If the thresholds are satisfied, IFG can cover certain travel and conference costs.

#### *Use of Solicitors*

Associated persons of PFA, either acting as associated persons of PFA or as registered representatives of Independent Financial Group, LLC, may from time to time interact with individuals ("Solicitors") in Israel for the purpose of referring clients. These dealings are subject to certain FINRA rules, as well as SEC rules governing investment advisers. PFA may enter into arrangements with Solicitors whereby the Solicitors will refer clients who may be a candidate for investment advisory services to PFA. In return, PFA will agree to compensate the Solicitor for the referral. Compensation to the Solicitor is dependent on the client entering into an advisory agreement with PFA for advisory services. Compensation to solicitor will be an agreed upon percentage of the total investment amount transferred or deposited to the custodian account and maintained in the account. The solicitation/referral fee is paid pursuant to a written agreement retained by both the investment adviser and the Solicitor. The Solicitor will be required to provide the client with a copy of PFA's Disclosure Brochure and a Solicitor Disclosure prior to or at the time of entering into any investment advisory contract with PFA. Solicitor is not permitted to offer clients any investment advice on behalf of PFA. Clients' advisory fee will not be increased as a result of compensation being shared with Solicitor.

**Financial Information**

PFA will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service.

As stated above, PFA has discretionary authority over client accounts; however that authority does not extend to the withdrawal of any client assets, with the exception of deduction of PFA's advisory fees from your accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.

Neither PFA nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

Item 1  
**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

**Shimshon Plotkin, CFP®**  
**Plotkin Financial Advisors, LLC**  
**8401 Connecticut Avenue, Suite 400**  
**Chevy Chase, MD 20815**  
**P: 301-907-9790**  
**[www.pfallc.com](http://www.pfallc.com)**

May 2017

**This brochure supplement provides information about Shimshon Plotkin that supplements the Plotkin Financial Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Sarah Hunt if you did not receive Plotkin Financial Advisors, LLC's brochure or if you have any questions about the contents of this supplement.**

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

## Shimshon Plotkin, CFP®

### Item 2 - Educational Background and Business Experience

Year of Birth: 1946

#### Education:

Name of School	Years Attended	Year Graduated	Degree
University of Texas	1967 to 1971	1971	B.S.E.E and B.S.M.E
Georgia Institute of Technology	1971 to 1974	1974	MS in Industrial Management

Certified Financial Planner (CFP®) Designation in 1999

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.

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 Bachelor’s 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 three 8-day testing windows. The exam is comprised of 170 multiple-choice questions, including stand-alone questions and sets of questions associated with short scenarios or more lengthy case histories.;
- Experience – Complete 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship pathway that meets additional requirements. Qualifying experience may be acquired through a variety of activities and professional settings including personal delivery, supervision, direct support, indirect support or teaching.;
- 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.

*Business Background:*

Name of Employer	Type of Business	Title	Period of Employment
Plotkin Financial Advisors, LLC	Investment Adviser	Member, Advisory Representative	04/2003 to Present
Independent Financial Group, LLC	Broker/Dealer	Registered Representative	11/2011 to Present
SP Financial Advisors, Inc.	Consulting	President	03/2016
Pacific West Securities, Inc.	Broker/Dealer	Registered Representative	09/2006 to 10/2011
Cambridge Investment Research, Inc.	Broker/Dealer	Registered Representative	10/2005 to 09/2006

**Item 3 - Disciplinary Information**

Shimshon Plotkin is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of him or the services offered by him.

**Item 4 - Other Business Activities**

Shimshon Plotkin is dually registered as an advisory representative of Plotkin Financial Advisors, LLC ("PFA") and as a registered representative of Independent Financial Group, LLC, Inc, a registered broker/dealer, member of the Financial Industry Regulatory Authority and SIPC. Clients are under no obligation to purchase or sell securities through Shimshon Plotkin. Independent Financial Group, LLC and PFA are not affiliated. Shim is an independent contractor of Independent Financial Group, LLC.

Shim may recommend clients implement recommendations through Independent Financial Group, LLC. If the clients implement investment recommendations through Independent Financial Group, LLC, Shim may receive a commission. Additionally, as further disclosed in the Disclosure Brochure under the section entitled Brokerage Practices, Shim may receive trail compensation for investments directed through Independent Financial Group, LLC. Therefore, there is a conflict of interest to cause a client to direct certain securities business through Independent Financial Group, LLC.

Additionally, Shim is a licensed insurance agent. You are not obligated to purchase insurance or securities products through Shim. However, if you implement insurance recommendations through him, he will receive commissions. The insurance business is a minority of his business and the amount of income he receives from insurance business fluctuates depending on the amount of sales. You are advised there may be other insurance products and services available through other insurance professionals at a lower cost than those products available through Shim.

Shim is an indirect owner of Monarch Global Partners, LLC. Monarch Global Partners is a marketing company on behalf of First Trust for the purpose of marketing First Trust exchange traded funds to non-US citizens and primarily Israeli citizens. In return for marketing the First Trust exchange traded funds to non-US citizens, First Trust has agreement to pay Monarch Global Partners, LLC compensation based on a percentage of total sales. This is a conflict of interest to market First Trust exchange traded funds as a result of receipt of compensation based on the sales. This arrangement does not include sales of First Trust exchange traded funds in the United States.

It is important clients refer to the disclosures under Brokerage Practices in the Disclosure Brochure.

Shim is not actively engaged in any other investment-related business or occupation. Further, he is not actively engaged in any other business or occupation for compensation. “Actively engaged” is deemed to mean the business activity represents more than 10 percent of his time and income.

## **Item 5 - Additional Compensation**

Clients are advised the amount of commissions paid by Independent Financial Group, LLC to Shim can fluctuate based on his overall production. Therefore, the more business placed by Shim through Independent Financial Group, LLC can enable Shim to reach another threshold enabling him to earn a higher payout.

PFA has agreements with various alternative investment sponsors for exclusivity to offer alternative investment products to Israeli citizens. **Additionally, many of the alternative investment sponsors pay an incentive or bonus commission to advisory representatives who are registered representatives for any units of the programs purchased by international investors. This is a conflict of interest. To help mitigate this conflict of interest, all sales of units of any alternative investment must flow through the broker/dealer with which the advisory representative is registered and the applications go through a suitability review.**

## **Item 6 - Supervision**

Supervision and oversight of the activities conducted through PFA is conducted by Sarah Hunt, Chief Compliance Officer of PFA. Sarah Hunt can be contacted at 301-907-9790. Sarah Hunt has implemented written policies and procedures for conducting and overseeing advisory business and a code of ethics for PFA. All advisory representatives are required to attest to receipt and agreement to comply with the policies and procedures and code of ethics.

As stated in the Disclosure Brochure and as indicated above, Independent Financial Group, LLC will also oversee the securities business of Ittai. As a registered representative of Independent Financial Group, LLC, Ittai is subject to oversight by Independent Financial Group, LLC over all his securities activities and certain outside business activities. Such oversight includes review of Ittai's securities business to ensure he considers the client's best interests.

Item 1  
**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

**Ittai Dvir, CFP®**  
**Plotkin Financial Advisors, LLC**  
**8401 Connecticut Avenue, Suite 400**  
**Chevy Chase, MD 20815**  
**P: 301-907-9790**  
**[www.pfallc.com](http://www.pfallc.com)**

**May 2017**

**This brochure supplement provides information about Ittai Dvir that supplements the Plotkin Financial Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Sarah Hunt if you did not receive Plotkin Financial Advisors, LLC's brochure or if you have any questions about the contents of this supplement.**

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



## Ittai Dvir, CFP®

### Item 2 - Educational Background and Business Experience

Year of Birth: 1977

#### Education:

Name of School	Years Attended	Year Graduated	Degree
Towson University	2002 to 2005	2005	BS in Finance

Certified Financial Planner (CFP®) Designation in 2012

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.

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 Bachelor’s 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 three 8-day testing windows. The exam is comprised of 170 multiple-choice questions, including stand-alone questions and sets of questions associated with short scenarios or more lengthy case histories.;
- Experience – Complete 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship pathway that meets additional requirements. Qualifying experience may be acquired through a variety of activities and professional settings including personal delivery, supervision, direct support, indirect support or teaching.;
- 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.

*Business Background:*

Name of Employer	Type of Business	Title	Period of Employment
Plotkin Financial Advisors, LLC	Investment Adviser	Advisory Representative	06/2009 to Present
Independent Financial Group, LLC	Broker/Dealer	Registered Representative	11/2011 to Present
ID Financial Advisors, Inc.	Consulting	President	08/2014 to Present
Pacific West Securities, Inc.	Broker/Dealer	Registered Representative	06/2009 to 10/2011
E*Trade Financial	Financial Services	Junior Portfolio Manager	09/2005 to 04/2009

**Item 3 - Disciplinary Information**

Ittai Dvir is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of him or the services offered by him.

**Item 4 - Other Business Activities**

Ittai Dvir is dually registered as an advisory representative of Plotkin Financial Advisors, LLC ("PFA") and as a registered representative of Independent Financial Group, LLC, a registered broker/dealer, member of the Financial Industry Regulatory Authority and SIPC. Clients are under no obligation to purchase or sell securities through Ittai Dvir. Independent Financial Group, LLC and PFA are not affiliated. Ittai is an independent contractor of Independent Financial Group, LLC.

Ittai may recommend clients implement recommendations through Independent Financial Group, LLC. If the clients implement investment recommendations through Independent Financial Group, LLC, Ittai may receive a commission. Additionally, as further disclosed in the Disclosure Brochure under the section entitled Brokerage Practices, Ittai may receive trail compensation for investments directed through Independent Financial Group, LLC. Therefore, there is a conflict of interest to cause a client to direct certain securities business through Independent Financial Group, LLC.

Ittai is an indirect owner of Monarch Global Partners, LLC. Monarch Global Partners is a marketing company on behalf of First Trust for the purpose of marketing First Trust exchange traded funds to non-US citizens and primarily Israeli citizens. In return for marketing the First Trust exchange traded funds to non-US citizens, First Trust has agreement to pay Monarch Global Partners, LLC compensation based on a percentage of total sales. This is a conflict of interest to market First Trust exchange traded funds as a result of receipt of compensation based on the sales. This arrangement does not include sales of First Trust exchange traded funds in the United States.

It is important clients refer to the disclosures under Brokerage Practices in the Disclosure Brochure.

Ittai is not actively engaged in any other investment-related business or occupation. Further, he is not actively engaged in any other business or occupation for compensation. "Actively engaged" is deemed to mean the business activity represents less than 10 percent of his time and income.

**Item 5 - Additional Compensation**

Clients are advised the amount of commissions paid by Independent Financial Group, LLC to Ittai can fluctuate based on his overall production. Therefore, the more business placed by Ittai through Independent Financial Group, LLC can enable Ittai to reach another threshold enabling him to earn a higher payout.

PFA has agreements with various alternative investment sponsors for exclusivity to offer alternative investment products to Israeli citizens. **Additionally, many of the alternative investment sponsors pay an incentive or bonus commission to advisory representatives who are registered representatives for any units of the programs purchased by international investors. This is a conflict of interest. To help mitigate this conflict of interest, all sales of units of any alternative investment must flow through the broker/dealer with which the advisory representative is registered and the applications go through a suitability review.**

### **Item 6 - Supervision**

Supervision and oversight of the activities conducted through PFA is conducted by Sarah Hunt, Chief Compliance Officer of PFA. Sarah Hunt can be contacted at 301-907-9790. Sarah Hunt has implemented written policies and procedures for conducting and overseeing advisory business and a code of ethics for PFA. All advisory representatives are required to attest to receipt and agreement to comply with the policies and procedures and code of ethics.

As stated in the Disclosure Brochure and as indicated above, Independent Financial Group, LLC will also oversee the securities business of Ittai. As a registered representative of Independent Financial Group, LLC, Ittai is subject to oversight by Independent Financial Group, LLC over all his securities activities and certain outside business activities. Such oversight includes review of Ittai's securities business to ensure he considers the client's best interests.

Item 1  
**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

**Erich Imphong, CFP®  
Plotkin Financial Advisors, LLC  
8401 Connecticut Avenue, Suite 400  
Chevy Chase, MD 20815  
P: 301-907-9790  
[www.pfallc.com](http://www.pfallc.com)**

**March 2017**

**This brochure supplement provides information about Erich Imphong that supplements the Plotkin Financial Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Sarah Hunt if you did not receive Plotkin Financial Advisors, LLC's brochure or if you have any questions about the contents of this supplement.**

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

## Erich Imphong, CFP®

### Item 2 - Educational Background and Business Experience

Year of Birth: 1983

#### Education:

Name of School	Years Attended	Year Graduated	Degree
Davidson College	2002-2003		
Catholic University	2004-2006	2006	B.S. Arts & Science
Loyola University	2011-2014	2014	MSF Finance

Certified Financial Planner (CFP®) Designation in 2012

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.

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 Bachelor’s 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.

*Business Background:*

Name of Employer	Type of Business	Title	Period of Employment
Plotkin Financial Advisors, LLC	Investment Adviser	Advisory Representative	08/2016 to Present
Geier Asset Management	Investment Adviser	Advisory Representative	05/2006 to 07/2016
Triad Advisors, Inc.	Broker/Dealer	Registered Representative	09/2006 to 12/2010

**Item 3 - Disciplinary Information**

Erich Imphong is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of him or the services offered by him.

**Item 4 - Other Business Activities**

Erich Imphong is dually registered as an advisory representative of Plotkin Financial Advisors, LLC ("PFA") and as a registered representative of Independent Financial Group, LLC, Inc, a registered broker/dealer, member of the Financial Industry Regulatory Authority and SIPC. Clients are under no obligation to purchase or sell securities through Erich Imphong. Independent Financial Group, LLC and PFA are not affiliated. Erich is an independent contractor of Independent Financial Group, LLC.

Erich may recommend clients implement recommendations through Independent Financial Group, LLC. If the clients implement investment recommendations through Independent Financial Group, LLC, Erich may receive a commission. Additionally, as further disclosed in the Disclosure Brochure under the section entitled Brokerage Practices, Erich may receive trail compensation for investments directed through Independent Financial Group, LLC. Therefore, there is a conflict of interest to cause a client to direct certain securities business through Independent Financial Group, LLC.

Erich is not actively engaged in any other investment-related business or occupation. Further, he is not actively engaged in any other business or occupation for compensation. "Actively engaged" is deemed to mean the business activity represents less than 10 percent of his time and income.

**Item 5 - Additional Compensation**

Clients are advised the amount of commissions paid by Independent Financial Group, LLC to Erich can fluctuate based on his overall production. Therefore, the more business placed by Erich through Independent Financial Group, LLC can enable Erich to reach another threshold enabling him to earn a higher payout.

**Item 6 - Supervision**

Supervision and oversight of the activities conducted through PFA is conducted by Sarah Hunt, Chief Compliance Officer of PFA. Sarah Hunt can be contacted at 301-907-9790. Sarah Hunt has implemented written policies and procedures for conducting and overseeing advisory business and a code of ethics for PFA. All advisory representatives are required to attest to receipt and agreement to comply with the policies and procedures and code of ethics.

As stated in the Disclosure Brochure and as indicated above, Independent Financial Group, LLC will also oversee the securities business of Erich. As a registered representative of Independent Financial Group, LLC, Erich is subject to oversight by Independent Financial Group, LLC over all his securities activities and certain outside business activities. Such oversight includes review of Erich's securities business to ensure he considers the client's best interests.