King Wealth Management Group

Item 1. Cover Page

February 15, 2024

King Wealth Management Group LLC

A Registered Investment Adviser

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This brochure provides information about the qualifications and business practices of King Wealth Management, LLC (hereinafter "King Wealth Management" or the "Firm"). If you have any questions about the contents of this brochure, please contact Lawrence E. King at (518) 306-5640. 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 King Wealth Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

King Wealth Management, LLC is an SEC registered investment adviser. Registration does not imply any level of skill or training.

Item 2. Material Changes

In this Item, King Wealth Management is required to discuss any material changes which have been made to the brochure since the last annual amendment.

Since our last annual update, King Wealth Management Group is no longer voting client proxies. See item 17, Voting Client Proxies for more details.

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Item 4. Advisory Business

King Wealth Management offers investment management and financial planning services to its clients. Prior to engaging King Wealth Management to provide any of the foregoing advisory services, clients are required to enter into one or more written agreements with King Wealth Management setting forth the terms and conditions of the advisory relationship (collectively the "Agreement").

King Wealth Management is a limited liability company formed in the State of Delaware in February, 2012. The Firm has been conducting business as an investment adviser since February 2012. The firm is owned by Lawrence E. King.

As of December 31, 2023, King Wealth Management manages a total of $751,257,817 of which

$740,307,208 are discretionary assets and $10,950,609 are non-discretionary assets.

While this brochure describes the business of King Wealth Management, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm's officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on King Wealth Management's behalf and is subject to King Wealth Management's supervision or control.

Investment Management Services

King Wealth Management generally provides clients with investment management services, which may include a broad range of comprehensive financial planning services as well as the discretionary and/or non-discretionary management of investment portfolios. The Firm's financial planning services are tailored to the individual needs of the client, and may include retirement planning, client education, estate planning, wealth transfer, business planning, insurance and tax planning, and cash flow needs of the client. In limited circumstances, King Wealth Management offers financial planning services on a stand- alone basis.

King Wealth Management primarily allocates clients investment management assets among individual equity and debt securities and exchange-traded funds ("ETFs"). The Firm may also utilize on a more limited basis mutual funds and commodities. In limited circumstances, King Wealth Management allocates clients' investment management assets among Independent Managers (as defined below).

In addition, King Wealth Management may recommend that clients who are "accredited investors" as defined under Rule 501 of the Securities Act of 1933, as amended, invest in private placement securities, which may include debt, equity, and/or pooled investment vehicles when consistent with the clients' investment objectives. The Firm also provides advice about any type of investment held in clients' portfolios.

King Wealth Management also may render non-discretionary investment management services to clients relative to variable life/annuity products that they may own, their individual employer- sponsored retirement plans, and/or 529 plans or other products that may not be held by the client's primary custodian. In so doing, King Wealth Management either directs or recommends the allocation of client assets among the various investment options that are available with the product. Client assets are maintained at the specific insurance company or custodian designated by the product.

Clients may impose reasonable restrictions or mandates on the management of their account (e.g., require that a portion of their assets be invested in socially responsible funds) if, in King Wealth Management's sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to its management efforts.

When King Wealth Management provides financial planning services, the Firm is not required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information. King Wealth Management may recommend the services of itself and/or other professionals to implement its recommendations. Clients are under no obligation to act upon any of the recommendations made by King Wealth Management under a financial planning engagement or to engage the services of any such recommended professional, including King Wealth Management itself.

King Wealth Management tailors its advisory services to the individual needs of clients. King Wealth Management consults with clients initially and on an ongoing basis to determine risk tolerance, time horizon and other factors that may impact the clients' investment needs. The Firm ensures that clients' investments are suitable for their investment needs, goals, objectives and risk tolerance.

Clients are advised that it remains their responsibility to promptly notify King Wealth Management if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising King Wealth Management's previous recommendations and/or services.

Use of Independent Managers

King Wealth Management may recommend in very limited circumstances that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain independent investment managers ("Independent Managers"). The terms and conditions under which the client engages the Independent Managers are set forth in a separate written agreement between King Wealth Management or the client and the designated Independent Managers. In addition to this brochure, clients also receive the written disclosure brochure of the designated Independent Managers engaged to manage their assets.

When selecting an Independent Manager for a client, King Wealth Management reviews information about the Independent Manager such as its disclosure brochure and/or material supplied by the Independent Manager or independent third parties for a description of the Independent Manager's investment strategies, past performance and risk results to the extent available. Factors that King Wealth Management considers in selecting an Independent Manager include the client's stated investment objectives, management style, performance, reputation, financial strength, reporting, pricing and research. The investment management fees charged by the designated Independent Managers, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, will be exclusive of, and in addition to, King Wealth Management's investment advisory fee set forth above. The client may incur additional fees than those charged by King Wealth Management, the designated Independent Managers, and the corresponding broker-dealer and custodian.

Certain Independent Managers may impose more restrictive account requirements and varying billing practices than King Wealth Management. In such instances, King Wealth Management may alter its corresponding account requirements and/or billing practices to accommodate those of the Independent Managers.

Item 5. Fees and Compensation

King Wealth Management offers its services on a fee basis, which may be fixed and/or based upon assets under management.

Investment Management Fees

King Wealth Management provides its investment management services for an annual fee based upon a percentage of the market value of the assets being managed by King Wealth Management. King Wealth Management's annual fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses which are incurred by the client. King Wealth Management does not, however, receive any portion of these commissions, fees, and costs.

King Wealth Management's annual investment management fee is prorated and charged quarterly, in advance, based upon the market value of the assets being managed by King Wealth Management on the last day of the previous quarter. The annual fee is a maximum of 1.50%. This fee is negotiable depending upon the market value of the assets under management and the type of investment management services to be rendered.

Alternatively, King Wealth Management may charge a fixed fee for investment management services, which will be negotiated between the Firm and the client. All accounts are subject to a minimum annual management fee of $500.00. This minimum annual fee may be waived at our discretion.

King Wealth Management may agree to a negotiated fee with a client whereby there are different fee schedules for different accounts owned by the same client. King Wealth Management may also agree to oversee some assets and not charge a fee. Other negotiated arrangements with customers may also result in different fees for different assets. In any instance such as these where the fee is not consistent across all accounts and all assets for a client, an inconsistent fee would create a conflict of interest in that King Wealth would benefit by recommending strategies that move assets to higher fee schedules. We strive to address this conflict of interest when it exists by discussing and disclosing the fee arrangement impact on the client total fee when making such a recommendation. Moreover, our investment recommendations are made to be consistent with each client's investment mandates taking into account our fiduciary obligation to the client.

King Wealth Management earns a fee for advising you. It is a conflict for us to recommend our services because we benefit from earning the fee when recommending our services. We strive to address this conflict by discussing the total cost of our services, the value of the benefits, and providing a copy of our client agreement which contains the fee arrangement in writing, acknowledged by a client signature.

Financial Planning Fees

For stand-alone financial planning services and advisory subscription services, King Wealth Management charges a fixed fee between $2,500 and $10,000 depending on the scope and length of the agreed upon services. While the specific terms and fee are negotiated in advance and set forth in the Agreement, King Wealth Management generally requires one-half of the financial planning fee payable upon execution of the Agreement with the balance due upon completion of the agreed upon services. If the client engages King Wealth Management for additional investment advisory services, King Wealth Management may offset all or a portion of its fees for those services based upon the amount paid for the financial planning services.

With regard to any of the investment management or financial planning fees mentioned above, King Wealth Management, in its sole discretion, may negotiate to charge a lesser fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, pro bono activities, etc.).

Fees Charged by Financial Institutions

As further discussed in response to Item 12 (below), King Wealth Management generally recommends that clients utilize the brokerage and clearing services of Fidelity Institutional Wealth Services ("Fidelity") for investment management accounts.

King Wealth Management may only implement its investment management recommendations after the client has arranged for and furnished King Wealth Management with all information and authorization regarding accounts with appropriate financial institutions. Financial institutions include, but are not limited to, Fidelity, another broker-dealer recommended by King Wealth Management, broker- dealer directed by the client, trust companies, banks etc. (collectively referred to herein as the "Financial Institutions").

Clients will incur certain charges imposed by the Financial Institutions and other third parties such as fees charged by Independent Managers, custodial fees, charges imposed directly by a mutual fund or ETF in the account, which are disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Additionally, clients will incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to King Wealth Management's fee. King Wealth Management and its supervised persons do not receive any portion of such other charges, fees and commissions.

Fee Debit

King Wealth Management's Agreement and the separate agreement with any Financial Institutions will authorize King Wealth Management and/or Independent Managers to debit the client's account for the amount of King Wealth Management's fee and to directly remit that management fee to King Wealth Management and/or the Independent Managers. Any Financial Institutions recommended by King Wealth Management have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to King Wealth Management.

Fees for Management During Partial Quarters of Service

For the initial period of investment management services, the fees are calculated on a pro rata basis.

The Agreement between King Wealth Management and the client will continue in effect until terminated by either party pursuant to the terms of the Agreement. King Wealth Management's fees may be prorated through the date of termination.

Clients may make additions to and withdrawals from their account at any time, subject to King Wealth Management's right to terminate an account. Additions may be in cash or securities provided that King Wealth Management reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. Clients may withdraw account assets on notice to King Wealth Management, subject to the usual and customary securities settlement procedures. However, King Wealth Management designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. King Wealth Management may consult with its clients about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

If assets are deposited into an Account after the inception of a quarter for which the Management Fee has been charged, the additional assets may also be subject to the Management Fee which shall be calculated on a pro rata basis commencing on the day that the additional assets are designated to us for management under this agreement. Such additional charges will be based on the number of days remaining in the quarter.

Item 6. Performance-Based Fees and Side-by-Side Management

King Wealth Management does not provide any services for performance-based fees. Performance-based fees are those based on a share of capital gains on or capital appreciation of a client's assets.

Item 7. Types of Clients

King Wealth Management provides its services to individuals, pension and profit-sharing plans, trusts, estates, high net worth individuals, charitable organizations, corporations and business entities.

Minimum Account Size

As a condition for starting and maintaining a relationship, King Wealth Management generally imposes a minimum portfolio size of $500,000. King Wealth Management, in its sole discretion, may accept clients with smaller portfolios based upon certain criteria including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, and pro bono activities. King Wealth Management only accepts clients with less than the minimum portfolio size if, in the sole opinion of King Wealth Management, the smaller portfolio size will not cause a substantial increase of investment risk beyond the client's identified risk tolerance. King Wealth Management may aggregate the portfolios of family members to meet the minimum portfolio size.

Minimums Imposed by Independent Managers

Certain Independent Managers may also maintain more restrictive account requirements and varying billing practices than King Wealth Management. In these instances, the Firm may alter its corresponding account requirements and/or billing practices to accommodate those of the Independent Managers.

Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis and Investment Strategies

King Wealth Management primarily allocates clients' investment management assets among individual equity and debt securities and ETFs. The Firm may also utilize on a more limited basis mutual funds and commodities. In very limited circumstances, King Wealth Management allocates clients' investment management assets among Independent Managers.

King Wealth Management develops individual investment strategies based upon each client's specific risk profile and investment objectives. The Firm generally employs a fundamental analytical approach with a technical overlay.

Fundamental analysis involves an evaluation of an issuer's fundamental financial condition and competitive position. King Wealth Management generally analyzes the financial condition, capabilities of management, earnings capacity, new products and services, as well as the company's markets and position amongst its competitors in order to determine the recommendations made to clients. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

Technical analysis involves the examination of past market data rather than specific company information in determining the recommendations made to clients. Technical analysis may involve the use of mathematical based indicators and charts, such as moving averages and price correlations, to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. A substantial risk in relying upon technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that King Wealth Management will be able to accurately predict such a reoccurrence.

Risks of Loss

Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV.

There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Options

Options allow investors to buy or sell a security at a contracted "strike" price (not necessarily the current market price) at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge (limit) losses in an attempt to reduce risk or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

Market Risks

The profitability of a significant portion of King Wealth Management's recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that King Wealth Management will be able to predict those price movements accurately.

Use of Independent Managers

King Wealth Management may select Independent Managers for certain clients. King Wealth Management will continue to do ongoing due diligence of such managers, but such selections rely, to a great extent, on the Independent Managers ability to successfully implement their investment strategies. In addition, King Wealth Management generally does not have the ability to supervise the Independent Managers on a day-to-day basis.

Use of Private Collective Investment Vehicles

King Wealth Management may recommend the investment by certain clients in privately placed collective investment vehicles (some of which may be typically called "hedge funds"). The managers of these vehicles will have broad discretion in selecting the investments. There are few limitations on the types of securities or other financial instruments which may be traded and no requirement to diversify. The hedge funds may trade on margin or otherwise leverage positions, thereby potentially increasing the risk to the vehicle. In addition, because the vehicles are not registered as investment companies, there is an absence of regulation. There are numerous other risks in investing in these securities. The client will receive a private placement memorandum and/or other documents explaining such risks.

Use of Margin

To the extent that a client authorizes the use of margin, and margin is thereafter employed by King Wealth Management in the management of the client's investment portfolio, the market value of the client's account and corresponding fee payable by the client to King Wealth Management will be increased. As a result, in addition to understanding and assuming the additional principal risks associated with the use of margin, clients authorizing margin are advised of the potential conflict of interest whereby the client's decision to employ margin shall correspondingly increase the management fee payable to King Wealth Management. Accordingly, the decision as to whether to employ margin is left totally to the discretion of client.

While the use of margin borrowing can substantially improve returns, such use may also increase the adverse impact to which a client's portfolio may be subject. Borrowings will usually be from securities brokers and dealers and will typically be secured by the client's securities and/or other assets. Under certain circumstances, such a broker-dealer may demand an increase in the collateral that secures the client's obligations and if the client were unable to provide additional collateral, the broker-dealer could liquidate assets held in the account to satisfy the client's obligations to the broker-dealer.

Liquidation in that manner could have extremely adverse consequences. In addition, the amount of the client's borrowings and the interest rates on those borrowings, which will fluctuate, will have a significant effect on the client's profitability.

General Risk of Loss

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss.

Item 9. Disciplinary Information

King Wealth Management is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. King Wealth Management does not have any required disclosures to this Item.

Item 10. Other Financial Industry Activities and Affiliations

King Wealth Management is not and does not have a related person that is a broker-dealer, registered representative of a broker-dealer, investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, insurance company or agency a pension consultant, a real estate broker or dealer, or a sponsor or syndicator of limited partnerships.

We are an independent registered investment adviser and only provide investment advisory services.

King Wealth Management is required to disclose any relationship or arrangement that is material to its advisory business or to its clients with certain related persons. King Wealth Management has described such relationships and arrangements below.

Independent Managers

As discussed above in Item 4 and Item 5, King Wealth Management recommends that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain Independent Managers. King Wealth Management does not receive a referral fee or solicitor fee from any Independent Managers we recommend. Fees charged by Independent Managers are separate and distinct from the fees charged by King Wealth Management and we do not receive any portion of fees charged by Independent Managers to our clients.

Item 11. Code of Ethics

King Wealth Management and persons associated with King Wealth Management ("Associated Persons") are permitted to buy or sell securities that it also recommends to clients consistent with King Wealth Management's policies and procedures.

King Wealth Management has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("Code of Ethics"). In accordance with Section 204(A) of the Investment Advisers Act of 1940 (the "Advisers Act"), its Code of Ethics contains written policies reasonably designed to prevent the unlawful use of material non-public information by King Wealth Management or any of its Associated Persons. The Code of Ethics also requires that certain of King Wealth Management's personnel (called "Access Persons") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

King Wealth Management has procedures in place to ensure trading is done in the best interest of our clients and to prevent Access Persons or their immediate family (i.e. spouse, minor children, and adults living in the same household as Access Person) from receiving preferential pricing on trades.

Clients and prospective clients may contact King Wealth Management to request a copy of its Code of Ethics.

Item 12. Brokerage Practices

As discussed in Item 5, King Wealth Management generally recommends that clients utilize the brokerage and clearing services of Fidelity.

Factors which King Wealth Management considers in recommending Fidelity, or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. Fidelity enables King Wealth Management to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. In addition, Fidelity has, from time to time, agreed to compensate clients for any transfer fees that may be assessed for moving their account(s) to Fidelity. The commissions and/or transaction fees charged by Fidelity may be higher or lower than those charged by other Financial Institutions.

The commissions paid by King Wealth Management's clients comply with King Wealth Management's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where King Wealth Management determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. King Wealth Management seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

King Wealth Management periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

The client may direct King Wealth Management in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution, and King Wealth Management will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by King Wealth Management (as described below). As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, King Wealth Management may decline a client's request to direct brokerage if, in King Wealth Management's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Transactions for each client generally will be effected independently, unless King Wealth Management decides to purchase or sell the same securities for several clients at approximately the same time. King Wealth Management may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among King Wealth Management's clients' differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among King Wealth Management's clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that King Wealth Management determines to aggregate client orders for the purchase or sale of securities, including securities in which King Wealth Management's Supervised Persons may invest, King Wealth Management generally does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission.

King Wealth Management does not receive any additional compensation or remuneration as a result of the aggregation. In the event that King Wealth Management determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, King Wealth Management may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker- dealers in return for investment research products and/or services which assist King Wealth Management in its investment decision-making process. Such research generally will be used to service all of King Wealth Management's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because King Wealth Management does not have to produce or pay for the products or services.

Software and Support Provided by Financial Institutions

King Wealth Management receives from Financial Institutions, without cost to King Wealth Management, software, tools and service offerings, which allow King Wealth Management to better monitor client accounts maintained at Fidelity. King Wealth Management receives such services and support without cost because King Wealth Management renders investment management services to clients that maintain assets at Fidelity. Support provided may benefit King Wealth Management, but not its clients directly. In fulfilling its duties to its clients, King Wealth Management endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the Firm's receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence the Firm's choice of broker-dealer over another broker- dealer that does not furnish similar software, systems support, or services.

Additionally, King Wealth Management receives the following benefits from Fidelity Institutional Wealth Services Group: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Institutional Wealth Services Group participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

Item 13. Review of Accounts

For those clients to whom King Wealth Management provides investment management services, King Wealth Management monitors those portfolios as part of an ongoing process while regular account reviews are conducted on an annual basis. For those clients to whom King Wealth Management provides financial planning services, reviews are conducted on an "as needed" basis. Such reviews are conducted by one of King Wealth Management's investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with King Wealth Management and to keep King Wealth Management informed of any changes thereto. King Wealth Management contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts.

Those clients to whom King Wealth Management provides investment advisory services may also receive a report from King Wealth Management that may include such relevant account and/or market-related information such as an inventory of account holdings and account performance as clients may request from time to time. Clients should compare the account statements they receive from their custodian with those they receive from King Wealth Management.

Those clients to whom King Wealth Management provides financial planning services will receive reports from King Wealth Management summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by King Wealth Management.

Item 14. Client Referrals and Other Compensation

King Wealth Management is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. This type of relationship poses a conflict of interest and any such relationship is disclosed in response to Item 12, above.

In addition, King Wealth Management is required to disclose any direct or indirect compensation that it provides for client referrals. The Firm does not compensate persons for client referrals.

Item 15. Custody

King Wealth Management is generally given the authority from clients to deduct advisory fees directly from client accounts. Such authority is deemed to be custody as defined by the SEC. King Wealth Management is also deemed to have custody of client funds and securities when King Wealth Management has standing authority (also known as a standing letter of authorization or "SLOA") to move money from a client's account to a third-party account.

King Wealth Management has established procedures to ensure all client funds and securities are held at a Financial Institution, as the qualified custodian in a separate account for each client under that client's name. Clients, or an independent representative of the client (other than an affiliated person of King Wealth Management) are also notified, in wiring of the qualified custodian's name, address and the manner in which the funds or securities are maintained, promptly when the account is opened and following any changes.

Item 16. Investment Discretion

Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative (other than an affiliated person of King Wealth Management), at least quarterly. Clients are strongly urged to compare any statements or reports from King Wealth Management against the account statements received directly from qualified custodians.

King Wealth Management may be given the authority to exercise discretion on behalf of its clients. King Wealth Management is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. King Wealth Management is given this authority through a power-of-attorney included in the agreement between King Wealth Management and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). King Wealth Management takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made; and
- The Independent Managers to be hired or fired.

Item 17. Voting Client Securities

King Wealth Management Group does not vote proxies on behalf of clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory cost associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in your account(s).

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided. If you have questions about a particular proxy-vote(s), you can contact us at your convenience, and we can provide clearifications of the issues presented in the proxy voting materials based on our understanding of the issues.

Item 18. Financial Information

King Wealth Management does not require or solicit the prepayment of more than $1,200 in fees six months or more in advance. In addition, King Wealth Management is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

King Wealth Management has no disclosures pursuant to its financial information.

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