

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

January 2024

Item 1 Cover Page

COVER PAGE

This brochure provides information about the qualifications and business practices of Kimberly C Good, President of KCG Investment Advisory Services LLC. If you have any questions about the contents of this brochure, please contact Kimberly using the contact information provided below. The information in this brochure has not been approved or verified by state securities authorities.

Registration does not imply a certain level of skill or training.

Additional information about KCG Investment Advisory Services LLC is also available on the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Physical Address:

315 Commercial Drive C1  
Savannah GA 31406

Contact Info:

Phone: (912) 335-8071

Cell: (912) 224-3069

Fax: (912)356-3957

Email: [kgood@kcginvestmentadvisory.com](mailto:kgood@kcginvestmentadvisory.com)

Web site: [www.kcginvestmentadvisory.com](http://www.kcginvestmentadvisory.com)

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Item 2 Material Changes  
Item 3 Table of Contents

MATERIAL CHANGES

None

TABLE OF CONTENTS

PAGE #) SUBJECT

PAGE 1) COVER PAGE

PAGE 2) MATERIAL CHANGES  
TABLE OF CONTENTS

PAGE 3) ADVISORY BUSINESS

PAGE 4) FEES & COMPENSATION

PAGE 5) PERFORMANCE BASED FEES

TYPES OF CLIENTS

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

DISCIPLINARY INFORMATION

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

PAGE 6) CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT

TRANSACTIONS AND PERSONAL TRADING

BROKERAGE PRACTICES

REVIEW OF ACCOUNTS

PAGE 7) CLIENT REFERRALS AND OTHER COMPENSATION

CUSTODY

INVESTMENT DISCRETION

VOTING CLIENT SECURITIES

PAGE 8) FINANCIAL INFORMATION

REQUIREMENTS FOR STATE REGISTERED ADVISORS

PAGE 9) ADV 2B SUPPLEMENT

Item 4 Advisory Business

### ADVISORY BUSINESS

Kimberly Good currently owns 100% of KCG Investment Advisory Services LLC

Advisory Services offered include:

*Portfolio Management for individuals and small businesses-* Advisor constructs, monitors, and manages individual securities and funds to accomplish the investment objectives of the Client as defined in the Investment Policy Statement. The Investment Philosophy to which the Advisor adheres is a combination of Modern Portfolio Theory (the principle that investment risk can be managed through asset allocation and diversification), and the active management of what the Advisor believes is an optimal combination of assets given current and trending market and economic conditions.

*Comprehensive Financial Planning Services-* Services will specifically include, but are not limited to Fact Finding, Problem Solving, and the coordination and implementation of multiple target plans. Target Plans may include, but are not limited to Financial Statement construction and analysis, Cash Flow and Net Worth, Risk Management, Income Tax Planning, Business Planning, College Funding, Retirement Planning, Investment Planning, Estate Planning and Wealth Management Planning.

*Portfolio management for institutional clients other than investment companies-* Advisor will provide the same services for institutional clients as for individuals and small businesses. These clients might include, but are not limited to Unions, Trusts, and Foundations. The Investment Committee or Board of Directors will set Investment Policy for the institution and once implemented, investment changes require their approval.

*Cash Flow Management-*KCG coaches clients and provides tools for budget management, setting and reaching financial goals, and irregular income techniques.

*Workshops-* Overview and technical workshops, tools & resources.

*Diminished Capacity Preparation -* Compiling medical, financial and legal documentation for caretakers before the need arises, along with IDs and passwords and a checklist of red-flag questions; Informational releases to be made available at the time of diminished capacity. Updates are offered annually, stored in an on-line vault. Client may also choose to receive a file folder hard copy and USB file. Caretakers and Family are invited to participate in an annual review meeting.

*Selection of other advisers-* This service is generally appropriate for institutional clients and trusts where an Investment Committee or Board of Directors has the authority to set Investment Policy and once implemented, must approve any changes to the investment choices. Advisor will assist in determining the appropriate asset allocation based upon time horizon, liquidity need, and risk tolerance. Advisor will then suggest advisers within asset category. Once advisers are selected and their allocations implemented, Advisor will monitor each adviser's performance and report to the Committee/Board, recommending changes as they may be appropriate.

Advisory Services are tailored to the individual needs of the client according to risk tolerance and the personal preference of the client. Client may impose restrictions on investing in a particular security or type of security as identified in advance, in the Investment Policy Statement.

Item 5 Fees & Compensation

**FEES & COMPENSATION**

Advisory Services are available to Investment Management Clients. Investment Management Fees and Compensation (Item 5) are inclusive of these Advisory Services. Advisor may negotiate aggregated fee agreements when clients contract for special circumstances, multiple, separate, and fee-based services.

Maximum Fee Schedule:

Total Assets Under Management	Annual Fee
Up to \$250,000	1.80%
\$250,000 to \$1,000,000	1.45%
\$1,000,001 to \$3,000,000	1.25%
\$3,000,001 to \$5,000,000	1.00%
\$5,000,001 to \$10,000,000	0.75%
More than \$5,000,000	Negotiable

Advisor may have legacy fee schedules that differ from the above, however all new Clients of Advisor will adhere to the schedule stated here.

Fees are deducted from clients' Assets Under Management on a quarterly basis, in advance or in arrears. If terminated, advance fees will be refunded to the account. Arrears fees will be drafted. Clients may select to have fees billed directly if they prefer. In addition to Advisor's investment management fees, client accounts may be subject to custodian's transaction fees and mutual fund expenses. See Item 12: Brokerage Practices.

Clients are granted five (5) business days from the date of their contract to terminate the Investment Management Agreement (IMA) without pro-rata charge for services rendered. Should their contract terminate after five (5) business days, fee shall be pro-rated for days service was provided in the given billing period.

The IMA shall continue in effect until terminated by either party. This Agreement may be terminated at any time by effective immediately upon receipt of written notice from Client to Advisor, and this Agreement may be terminated at any time by Advisor upon at least thirty (30) days' written notice from Advisor to Client. Such termination will not affect the liabilities or the obligations of the parties under this Agreement arising from transactions initiated prior to such termination. In the event of termination of this Agreement, Advisor shall have no obligation whatsoever to recommend any action with respect to, or to liquidate, the securities, property or other assets in the Account. The authority of Advisor under this Agreement shall continue until receipt of written notice of death or incapacity of Client, and any action taken by Advisor prior to receipt of written notice of such event in reliance upon this Agreement shall be binding upon Client and Client's legal representatives, heirs and assigns.

Financial planning fees will be an annual based on an hourly fee of 250/hour, payable quarterly.

Advisor manages \$0 on a discretionary basis and \$0 on a non-discretionary basis as of October 17, 2023

Item 6 Performance Based Fees and Side by Side Management  
Item 7 Types of Clients  
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss  
Item 9 Disciplinary Information N/A  
Item 10 Other Financial Industry Activities and Affiliations

#### PERFORMANCE BASED FEES

Adviser shall not be compensated on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of the client. Performance-based compensation may create an incentive for the Advisor to recommend an investment that may carry a high degree of risk to the Client.

#### TYPES OF CLIENTS

Adviser generally provides investment advice for individual clients, trusts and retirement plan sponsors and participants.

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

Adviser uses model portfolios as a template for managing client portfolios. Model portfolio investment objective/risk tolerance levels range from Fixed Income and Conservative through Aggressive and Equity-Only. Models at each objective/risk level may vary by Client, according to client preference for security types, and sometimes, specific securities. Security types that may be included in Advisor models include Funds, Stocks, Bonds and Options. Our investment management strategy includes diversification and active management. Stocks and Bonds are analyzed primarily through fundamental analysis of the underlying entity, and technical indicators may be considered once they meet Advisor's fundamental parameters. Advisor's analysis focuses specifically on financial metrics including but not limited to 5,3, and 1-year trends in Return-on-Equity and Profit Margins, Debt to equity ratios within set limits consistent with market and economic conditions, and intrinsic value calculations using both proprietary formulas and discounted cash flow methods.

Funds are selected based upon their ranking within their Investment Objective peer group, fees, and availability from Custodian.

Frequent trading may affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Investing in securities involves risk of loss that a client should understand. A client's appropriate and agreed upon Risk/Reward Profile or Investment Objective will be defined in that client's Investment Policy Statement.

#### DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of Advisor's business or the integrity of Kimberly's management.

#### OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Investment Advisor Representatives of Adviser receive external compensation from sales of investment related services as Insurance Agents. This represents a conflict of interest because it gives an incentive to recommend services based on the fee amount received. This conflict is mitigated by disclosures, procedures and Adviser's fiduciary obligation to place the best interest of the Client first. Moreover, Clients are not required to engage the Agent or Agency if they do not wish to. More information on this can be found in the respective Investment Advisor Representative's Form U4 and ADV 2B.

Adviser does not receive compensation directly or indirectly from other advisers selected for clients that might create a material conflict of interest. Adviser has no other business relationships with those advisers.

Item 11 Code of Ethics, Participation of Interest in Client Transactions and Personal Trading  
Item 12 Brokerage Practices  
Item 13 Review of Accounts

### CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

As an investment adviser firm, we have an overarching fiduciary duty to our clients. They deserve our undivided loyalty and effort, and their interests come first. We have an obligation to uphold that fiduciary duty and see that our personnel do not take inappropriate advantage of their positions and the access to information that comes with their positions.

The Adviser holds their directors, officers, and employees accountable for adhering to and advocating the general standards as stated in the company Policies and Procedures to the best of their knowledge and ability.

Adviser, Kimberly Good of Advisor may buy or sell securities for herself that Advisor may also recommend to clients. Advisor's account does not trade ahead of Advisory clients, rather at the same time, or in the same batch of trades, as clients investing in the same model portfolio.

Adviser does not buy or sell securities that she personally owns to Advisory clients or recommend securities in which Adviser has any proprietary interest. Adviser maintains no sales interest in client transactions.

Adviser will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

### BROKERAGE PRACTICES

Client brokerage commissions may be used to obtain research or other services from a Broker dealer for all clients for which Advisor does not have to pay. Advisor may be incented to select or recommend a broker-dealer or custodian based on Adviser's interest in receiving research or services rather than the Clients' interest in receiving most favorable execution.

Adviser routinely recommends that Client transactions are executed through Schwab Institutional Services. Adviser permits Clients to direct brokerage, in which case Adviser may be unable to achieve most favorable execution of client transactions.

### REVIEW OF ACCOUNTS

Adviser uses model portfolios as a template for managing client portfolios. Model assets are monitored daily, and non-model assets are reviewed periodically, no less than once per quarter. Assets are considered for replacement when they fail to meet screening criteria and begin to underperform. Portfolios are considered for re-alignment or new allocations at least each four months.

Clients receive Custodian's monthly statements and Transaction Reports in paper format as well as online access if Client has opted to follow Advisor's recommendation of Schwab as their custodial.

Additionally, Client is offered Quarterly Performance Review meeting and Invoice is email from Advisor at the beginning of the following quarter.

Item 14 Client Referrals and Other Compensation  
Item 15 Custody  
Item 16 Investment Discretion  
Item 17 Voting Client Securities

#### CLIENT REFERRALS AND OTHER COMPENSATION

Advisor does not compensate any person or provide economic benefit for client referral.

#### CUSTODY

Client Accounts shall be held for safekeeping with Custodian.

When Advisor is authorized and empowered to issue instructions to Custodian, as specifically agreed by Client and itemized in Client's Investment Management Agreement, Advisor is deemed to have custody of assets.

Unless specifically agreed and itemized in Client's Investment Management Agreement, Client will provide signed instruction to custodian with third-party disbursement information and authorize Advisor, in writing, to direct transfers to third party. Custodian verifies signature of Client instruction and sends notice of the transfer to Client. Client only (not Advisor) may terminate or change instructions with Custodian. Advisor will not assist with any transfer to a related third-party or advisory affiliate. Custodian sends initial and annual notice and reminder to Client.

Clients are billed for services rendered quarterly. Clients enter into separate agreement to pay management or advisory fees to Adviser. Clients may grant or deny Custodian authorization to debit accounts for advisory fees. If authorization is granted, and upon receipt of an invoice from Adviser, Client authorizes Custodian to deduct fees from managed account(s) and remit directly to Adviser.

Clients may choose to be billed directly.

#### INVESTMENT DISCRETION

Advisor accepts discretionary authority to manage securities accounts on behalf of clients. Clients must execute an Investment Policy Statement outlining their Risk/Reward Profile, Investment Objective, and any limitations they may place on this authority. Discretionary authority is granted through the execution of the Adviser's Investment Management Agreement, which includes the Investment Policy Statement, and/or the execution of the Custodian's Limited Power of Attorney for each account under management.

#### VOTING CLIENT SECURITIES

Advisor does not vote proxies. Client shall be responsible for directing the manner in which proxies solicited by issuers of securities beneficially owned by Client may be voted, and making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the Assets including but not limited to, class action lawsuits.

Item 18 Financial Information  
Item 19 Requirements for State-Registered Advisers

### FINANCIAL INFORMATION

Advisor may receive fees in advance, or in arrears of services rendered, as agreed with Client per Client's Investment Management and/or Financial Planning contract.

Advisor has no financial conditions to disclose that would be reasonably likely to impair Advisor's ability to meet contractual commitments to Clients.

Advisor has not been the subject of a bankruptcy petition at any time during the past ten years.

### REQUIREMENTS FOR STATE-REGISTERED ADVISORS

#### A. Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

#### B. Outside Business Activities

The outside business activities for all Investment Advisor Representatives can be found in the Part 2B of this Brochure.

#### C. Performance Based Fee Description

Neither Advisor nor its management receive performance-based fees. Please see Item 6 of the ADV 2A for more information.

#### D. Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

1. Neither Advisor nor its management have been involved in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:

- a) An investment or an investment-related business or activity;
- b) Fraud, false statement(s) or omissions;
- c) Theft, embezzlement or other wrongful taking of property;
- d) Bribery, forgery, counterfeiting, or extortion;
- e) Dishonest, unfair or unethical practices.

2. Neither Advisor nor its management have been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- a) An investment or an investment-related business or activity;
- b) Fraud, false statement(s) or omissions;
- c) Theft, embezzlement or other wrongful taking of property;
- d) Bribery, forgery, counterfeiting, or extortion;
- e) Dishonest, unfair or unethical practices.

#### E. Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

#### F. Material Conflicts of Interest Assurance

All material conflicts of interest regarding Advisor, its representatives or any of its employees which could be reasonably expected to impair the rendering of unbiased and objective advice are disclosed.