

Item 1 Cover Page



Part 2A of Form ADV: Firm Brochure

February 2025

COVER PAGE

This brochure provides information about the qualifications and business practices of Kimberly C Good, President of KCG Investment Advisory Services LLC (“Advisor”). 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.

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MATERIAL CHANGES

None

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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.

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.

Advisor shall charge an advisory fee of no more than 1.80% on an annual basis. Advisor may have fee schedules that incorporate breakpoints and which may vary from Client to Client (e.g. Legacy Clients) but nevertheless will never exceed a maximum fee of 1.80%. Advisor may negotiate aggregated fee agreements when Clients contract for special circumstances, multiple, separate, and fee-based services.”

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 subject to an annual fee based on an hourly of \$250 per hour, payable quarterly.

Advisor manages \$46,000,000 on a discretionary basis and \$1,000,000 on a non-discretionary basis as of December 31, 2024.

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

Advisor 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

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

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Advisor 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 Advisor 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 Advisor'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.

Advisor does not receive compensation directly or indirectly from other advisers selected for clients that might create a material conflict of interest. Advisor 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 Advisor 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.

Advisor, 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.

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

Advisor 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 Advisor's interest in receiving research or services rather than the Clients' interest in receiving most favorable execution. Advisor routinely recommends that Client transactions are executed through Schwab Institutional Services. Advisor permits Clients to direct brokerage, in which case Advisor may be unable to achieve most favorable execution of client transactions.

REVIEW OF ACCOUNTS

Advisor 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 referrals.

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 Advisor. Clients may grant or deny Custodian authorization to debit accounts for advisory fees. If authorization is granted, and upon receipt of an invoice from Advisor, Client authorizes Custodian to deduct fees from managed account(s) and remit directly to Advisor. 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 Advisor'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 Advisors

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.

Item 1 Cover Page



Part 2B of Form ADV: *Brochure Supplement*

February 2025

COVER PAGE

This brochure supplement provides information about Kimberly C Good that supplements the KCG Investment Advisory Services brochure. You should have received a copy of that brochure. Please contact Kimberly C Good if you did not receive KCG Investment Advisory Service LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Kimberly C Good is available on the SEC's website at www.adviserinfo.sec.gov.

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Kimberly C Good CRD# 1858207

Item 2 Educational Background and Experience
 Item 3 Disciplinary Information

EDUCATIONAL BACKGROUND AND EXPERIENCE

Kimberly C Good

DOB: 4/30/1960

Post High School Education: BA Music Education at Bowling Green State University, OH
Chartered Life Underwriter: 5 core and three elective courses, equivalent of 24 semester hours and proctored exams.

Chartered Financial Consultant: Includes seven core and two elective courses, equivalent of 27 semester credit hours and proctored exam for each course.

Certified Financial Professional: Candidate must have a Bachelor's degree, at least 3 years of personal financial planning experience, successfully complete CFP Board's coursework and exam.

Chartered Retirement Plan Specialist: Online self-study course with proctored exam and annual CE requirements.

Certified Investment Management Analyst: Financial Services and Ethical conduct pre-Requisites, completion of classroom program provided through Investment Management Consultant Association at Wharton School, Philadelphia PA. 40 hours of CE required every 2 years.

Certified Private Wealth Advisor: Financial Services and Ethical conduct pre-Requisites, completion of classroom program provided through Investment Management Consultant Association at Chicago Booth, University of Chicago. 40 hours of CE required every 2 years.

Kimberly joined Tisch Investments, a private money manager in Ann Arbor, Michigan in 2000 as Director of Financial Planning and Assistant Portfolio Manager, overseeing investment portfolios for both high net worth individuals and institutional clients.

Kimberly moved to Savannah Georgia in May of 2006, when she joined The Fiduciary Group, an SEC registered adviser, as one of a three person team managing the firm's assets under management. She moved to Alpha Financial Management, a Georgia state registered adviser in 2008 until forming her own firm in April of 2009.

Kimberly formed her own Registered Investment Advisory practice in 2009 which became an LLC in 2011, **KCG Investment Advisory Services LLC**, headquartered in Savannah Georgia.

She partnered with Destiny Wealth Partners, a minority, 25% partner 2021-2023. The partnership was organized under the corporate umbrella of DWP. Kimberly exercised her option to withdraw at the end of 2023.

DISCIPLINARY INFORMATION

There are no legal or disciplinary events material to a client's or prospective client's evaluation of Kimberly C Good.

Item 4 Other Business Activities
Item 5 Additional Compensation
Item 6 Supervision
Item 7 Requirements for State-Registered Advisors

OTHER BUSINESS ACTIVITIES

Kimberly C Good has outside business activities as follows, and from time to time, may offer Clients services from these activities.

- Licensed Insurance Agent

These practices represent conflicts of interest because they give Kimberly C Good an incentive to recommend products and or services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures and the Advisor's fiduciary obligation to place the best interest of the Client first. Moreover, Clients are not required to purchase or engage Kimberly C Good for any products or services offered as Clients have the option to purchase them through another person or entity of their choosing. is not actively engaged in any other investment-related business or occupation.

ADDITIONAL COMPENSATION

Kimberly C Good receives compensation from investment management and financial planning clients only. Kimberly does not receive economic benefits from sales awards or other prizes.

SUPERVISION

Advice provided by Kimberly C Good to clients of KCG Investment Advisory Services LLC is monitored by Kimberly C Good herself. Advice is monitored through monthly compliance reviews for following Policies and Procedures of KCG Investment Advisory Services LLC, and client quarterly performance reporting.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Kimberly C Good has not been found liable in any arbitration claim, civil proceeding, by any self-regulatory organization or administrative proceeding. Kimberly has never been the subject of a bankruptcy petition.