



**Cornerstone Asset Management Services, Inc. (CAMS)**

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Date of Brochure: March 1, 2024

**This brochure provides information about the qualifications and business practices of Cornerstone Asset Management Services, Inc. (CAMS). If you have any questions about the contents of this brochure, please contact us at (440) 746-0707 and/or [nanastasakis@cornerstoneassetmgmt.com](mailto:nanastasakis@cornerstoneassetmgmt.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any states securities authority.**

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

**CAMS is a registered investment adviser, but registration does not imply a certain level of skill or training.**

## 2. Material Changes since last Annual Amendment

Since the last annual update dated March 1, 2023, the following material changes have been made:

- None

### 3. Table of Contents

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#### **Brochure Supplements – Investment Advisor Representatives**

Pages 15 – 38 contain Part 2B of Form ADV for IAR's

#### 4. Advisory Business

##### A. Description of advisory firm:

CAMS is an advisory firm located in Broadview Heights, OH. The firm incorporated in late 2005 and began to manage client accounts in January 2006. CAMS does not engage in any other business.

The principal owners of the firm are George Anastasakis, Nicholas E. Anastasakis and Stephanie G. Travers. CAMS is a privately held company. It is not affiliated with any other firm.

##### B. Types of advisory services offered:

**Alpha/Beta Solutions Platform:** CAMS provides discretionary investment advice to individuals through the Alpha/Beta Solutions Platform (“Platform”). Through the Platform, CAMS typically seeks to manage all or a portion of a client’s account (or “sleeve”) according to a model portfolio. The model portfolio is based on the purchase and sale recommendations of one or more third party investment managers or sub-advisers. CAMS will enter into a sub-adviser & model portfolio asset management agreement with a sub-adviser to provide third-party research that may include purchase and sale recommendations in the form of model portfolios to be used in the management of the investments in the client’s account, based on the individual needs and circumstances of each client. This may include CAMS as one of the model managers.

On a continuous basis, CAMS will monitor the performance of the account, will retain and release the sub-adviser/model managers and allocate and/or reallocate the account amount various investment options, according to the individual needs and circumstances of each client. CAMS will have full discretion to allocate and reallocate the account, to increase or decrease the portion of the account allocated to each investment and/or sub-adviser/model manager, including CAMS’ own investment strategies, and to hire new sub-adviser/model managers and fire existing sub-adviser/model managers. CAMS’ decisions with respect to the investment options and sub-adviser/model managers will be based, in part, on CAMS’ evaluation of the investment styles, strategies, risks and potential benefits of each investment option and each sub-adviser/model manager.

**Separately Managed Account Services:** CAMS primarily manages investment advisory accounts using proprietary model portfolios as well as various third party model portfolios on a discretionary basis. An advisor first meets with a client to evaluate the client’s needs, objectives and current portfolio. The advisor then recommends changes and, after the portfolio is established, we monitor the performance of the account. We specialize in a proprietary process in which we analyze investments in search of trends. When a trend is found, we move client assets accordingly based on their risk tolerance. We provide investment advice in respect to stocks, bonds, mutual funds, exchange traded funds and variable annuity sub-accounts. Our advice may be limited to those types of investments. We also provide management of 401(k)’s (or similar retirement plan accounts). Clients are free to contact their advisor or representative as often as they wish.

**Sub-Advisory Investment Management Services:** CAMS may provide investment management services on a discretionary basis to clients of various RIA’s and Independent Broker/Dealers under a sub-advisory asset management agreement. Under the terms of this agreement, CAMS, as Manager, may be appointed to act as investment manager for the

accounts of specific clients (“Clients”) and assume responsibility for the investment and reinvestment of assets within the client’s accounts as well as the provision of quarterly reports summarizing account performance, balances and holdings, and may also provide a web-based performance reporting tool for those clients that so desire.

**Consulting Services:** CAMS provides investment consulting services on an hourly or flat fee basis. CAMS may furnish investment advice through consultations and/or complete financial plans.

Clients are free to implement advice provided by consultation through any source they may choose.

The decision to accept any recommendation or advice provided by CAMS in its Consulting Services and all decisions regarding thereof are left to the client. Clients are free to implement recommended transactions through broker-dealers and other service providers other than those recommended by CAMS and clients are advised to evaluate independently the transaction execution services recommended by representatives. CAMS does not guarantee the results of its recommendations and losses can occur from receiving consulting services.

C. Advisory services are tailored to the individual needs of clients based on their responses to the Investment Policy Statement questionnaire. Clients complete an Investment Policy Statement with the guidance of an investment advisor representative (IAR) to choose an appropriate portfolio for their risk tolerance and investment time horizon. Clients may impose restrictions on investing in certain securities or types of securities. CAMS will make a reasonable effort to follow all investment management restrictions and instructions expressed to the firm by a client.

D. CAMS does not sponsor a wrap fee program.

E. Assets under management:

As of December 31, 2023 CAMS has assets of \$30,010,967 under discretionary management and approximately \$12,125 under non-discretionary management/assets under advisement.

F. Customer information may be shared with J.W. Cole Financial, Inc., an unaffiliated broker/dealer, in order to comply with certain regulatory requirements. Information will only be shared to the extent it is necessary to perform supervisory duties. We will not disclose customer information to any third parties for use in telemarketing, direct mail marketing, or other marketing through electronic mail to the consumer. The law permits us to share your identifying information and information about your transactions with nonaffiliated third parties for the purposes described above. We do not share your information with nonaffiliated third parties for any other reasons. Therefore, we are not providing an opt-out provision for information shared with nonaffiliated third parties.

## 5. Fees and Compensation

A. CAMS is compensated for its advisory services by a fee calculated as a percentage of assets under management or an hourly or flat fee rate. All fees are negotiable.

Portfolio Management Asset-based Fees (subject to maximum annual total client fee of 2.00%):

The Asset-based fee schedule for assets under management is:

**Option 1 – Alpha/Beta Solutions Platform Assets:**

CAMS Portfolio Management Fee: 0.75% (75 basis points)

Advisor Fee: up to 1.25% (125 basis points)

Total Fee to Client = CAMS Portfolio Management Fee + Advisor Fee = Maximum 2.00% Annual fee.

**Option 2 – Separately Managed Account or Variable Annuity Assets:**

CAMS Portfolio Management Fee: 0.55% - 1.00% (55-100 basis points)

Advisor Fee: up to 1.00% - 1.45% (100-145 basis points)

Total Fee to Client = CAMS Portfolio Management Fee + Advisor Fee = Maximum 2.00% Annual fee.

**Breakpoint Pricing Schedule – Applicable to Option 1 & 2 Pricing:**

Account Values \$500,000 - \$1,000,000 are eligible to receive a reduction of 0.10% of the applicable portfolio management fee.

Account Values \$1,000,000 and above are eligible to receive a reduction of 0.20% of the applicable portfolio management fee.

**Option 3 – ETF Platform Assets:**

CAMS Portfolio Management Fee: 0.25% (25 basis points)

Advisor Fee: up to 1.75% (175 basis points)

Total Fee to Client = CAMS Portfolio Management Fee + Advisor Fee = Maximum 2.00% Annual fee.

**Option 4 – Qualified Plan Assets:**

CAMS Portfolio Management Fee and Advisor Fee is determined on a case-by-case basis in conjunction with Plan Advisor, Custodian, Plan Administrator (TPA) and any other parties that may be involved.

These fees (all options) are billed calendar quarterly in arrears. They are based upon the account's value at the end of the preceding quarter. Related accounts may, at CAMS' discretion be combined for fee calculation purposes.

CAMS may impose an administration & reporting fee on a quarterly basis of \$20 per account for accounts greater than \$10,000.

Consulting Fees:

\$100 - \$300 per hour or a range of \$100 to \$20,000 for a flat fee.

The fees for CAMS' Consulting Comprehensive and Project services vary. The client has a choice of an hourly or flat fee, each of which depends upon the nature and scope of the advice requested by the client, the amount and nature of the research required to complete the project, the number of professional staff members needed to complete the client's assignment and the nature and number of reports requested by the client. Prior to engagement, each client signs an agreement which provides an estimate of the total fee for services. One-half of the estimated fee is due upon contract signing. The balance is due and billed to client after services are provided.

For Ongoing Advisory Services the initial annual retainer is quoted annually and can range between \$100 and \$1,000 a year. It is payable in quarterly installments, in advance. The fee is reassessed annually on the anniversary date of the agreement to determine adjustments to the annual fee. Clients are invoiced quarterly.

The agreement between CAMS and a client for Consulting Services may be terminated by either party at any time by written notice to the other. Any fee due, but not yet paid by a client, is due promptly after termination of the agreement. Any unearned portion of a prepaid fee is returned to the client.

- B. Fees for services are deducted from the client's account where it is allowed by the client and custodian. If fees are not able to be deducted from the client's account, the client will be billed for fees incurred. Clients may at times choose to be billed instead of having the fees deducted from their account.
- C. Clients also pay other fees in connection with our advisory services. Custodial fees and mutual fund/exchange traded fund internal management and other expenses are paid by the client. Clients may incur brokerage and other transaction costs.
- D. Clients may choose to pay Consulting Services fees in advance. If the client terminates the agreement fees are prorated to the date of termination and any unearned prepaid fee is refunded to the client.
- E. CAMS or CAMS investment advisor representatives (IAR) may accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds, exchange traded funds or variable annuities.
  - 1. This practice may present a conflict of interest and gives CAMS or the CAMS IAR an incentive to recommend investment products because of the sales compensation to be received, rather than on a client's needs. These conflicts should be discussed by each client with the client's CAMS IAR. As CAMS primarily recommends mutual funds, we generally recommend the use of no-transaction-fee (NTF) funds and "no-load" funds or "load-waived" funds.
  - 2. Clients have the option to purchase investment products that we recommend through other brokers or agents that are not affiliated with CAMS.
  - 3. Advisory fees are the primary compensation method. Commissions on sales of products do not reduce fees due CAMS.
  - 4. If advisory fees are charged in addition to commissions or markups, advisory fees may be reduced to offset the commission or markup.

Clients and prospective clients should be aware that CAMS' fees for management and consulting services may be higher or lower than obtainable elsewhere.

Clients and prospective clients should also be aware that in addition to the firm's advisory program fee, each mutual fund in which a client's assets are invested also pays its own advisory fees and other expenses which already have been deducted from the fund's reported performance and, depending on the fund, a client may be able to invest directly in the shares issued by a mutual fund with or without incurring any sales or advisory management fees. In addition, there are tax effects pertaining to fund share redemptions made by the firm. Redemptions are taxable events which may accelerate the recognition of capital gains, and frequent redemptions may result in short term, rather than long term, capital gains.

## **6. Performance-Based Fees**

Neither CAMS nor CAMS IAR's accepts performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of the assets of a client. In a performance-based fee arrangement, there is an incentive to favor accounts in which a fee is based on performance.

## **7. Types of Clients**

CAMS is able to provide investment advice to individuals, trusts, corporations, pensions and partnerships, but currently provides advice to mainly individuals.

CAMS may at times provide its investment advice to other investment advisory and brokerage firms through the use of a sub-adviser agreement.

The minimum account size for management services is generally \$30,000, but minimums may be negotiated with management.

## **8. Methods of Analysis, Investment Strategies and Risk of Loss**

Investing in any security involves risk of loss that clients should be prepared to bear.

### **A. Methods of Analysis:**

The CAMS investment process includes a proprietary, computer-aided investment analysis that combines fundamental analysis and technical analysis. This process aims to identify periods of relative strength in investment sectors which the portfolio managers will then act upon by moving client assets accordingly.

Technical analysis includes the interpretation of several investment charts which provide the portfolio managers general indicators of an investment's purchase or sale.

### **B. Investment Strategies:**

CAMS investment strategies are based upon client's risk tolerance, in other words, a risk-based portfolio selection. After completing an Investment Policy Statement (IPS) the client selects a portfolio based on their answers to the IPS questionnaire.

In the riskier portfolios, portfolio managers may choose to invest in such asset classes as leveraged funds, inverse funds, technology funds, gold & precious metals funds and other asset classes that typically experience the greatest risk/reward characteristics. In the lessor risk category portfolios, these asset classes are greatly limited in their investment or completely removed from possible purchase.

CAMS strategies can at times experience frequent trading of securities, and frequent trading can affect investment performance, particularly through increased brokerage



and other transaction costs and taxes and should be carefully considered prior to investment.

- C. CAMS typically recommends the use of stocks, bonds, mutual funds, exchange traded funds or variable annuity subaccounts. These securities, including conservative strategies, all involve the risk of loss and clients should be prepared to bear such risk. These securities are generally considered to be liquid investments, but at times they may institute certain holding period requirements which may cause an investor who sells prior to the expiration of such holding period to experience a penalty fee or short-term redemption fee. A portion of the client's account may be held in cash or cash equivalents, including money market mutual funds.

## 9. Disciplinary Information

- A. Criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which CAMS or a management person:
  - 1. was convicted of, or pled guilty or no contest to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses; **none have occurred.**
  - 2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses; **none have occurred.**
  - 3. was found to have been involved in a violation of an investment-related statute or regulation; **none have occurred.**
  - 4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the firm or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule or order; **none have occurred.**
- B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the firm or a management person
  - 1. was found to have caused an investment-related business to lose its authorization to do business; **none have occurred.**
  - 2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
    - a. denying, suspending, or revoking the authorization of the firm or a management person to act in an investment-related business; **none have occurred.**
    - b. barring or suspending the firm's or a management person's association with an investment-related business; **none have occurred.**
    - c. Otherwise significantly limiting the firm's or a management person's investment-related activities; **none have occurred.**
    - d. Imposing a civil money penalty of more than \$2,500 on the firm or a management person; **none have occurred.**
- C. A self-regulatory organization (SRO) proceeding in which the firm or a management person

1. was found to have caused an investment-related business to lose its authorization to do business; **none have occurred.**
2. was found to have been involved in a violation of the SRO's rules and was (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500; **none have occurred.**

## 10. Other Financial Industry Activities and Affiliations

- A. Management persons of CAMS are securities registered representatives of J.W. Cole Financial, Inc. IAR's of CAMS may be securities registered representatives of J.W. Cole Financial, Inc., GT Securities, Inc. or other registered broker dealers.
- B. Neither management persons, nor IAR's of CAMS are registered as a futures commission merchant, commodity pool operator, a commodity trading advisor or an associated person of the foregoing entities.
- C. CAMS may at times provide its investment advice to other investment advisory and brokerage firms through the use of a sub-adviser agreement, but are in no way affiliated with those firms.  
CAMS Representatives may also be licensed to sell insurance products through various insurance providers.  
IAR's of CAMS are securities registered representatives with broker-dealers and may also be licensed to sell insurance products through various companies.
- D. CAMS does not recommend or select other investment advisers.

## 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

- A. CAMS has adopted a code of ethics applicable to all persons at the firm who have access to confidential client records or to recommendations being made for client accounts. Designed to prevent conflicts of interest between the financial interests of clients and the interest of CAMS' staff, the procedures require such "access persons" to report transactions as they occur and quarterly. These reporting requirements allow supervisors at CAMS to review transactions made and monitor the same securities transactions for client accounts. The procedure also establishes certain bookkeeping requirements relating to these internal reporting rules. A copy of which will be provided upon request.
- B. Neither management persons nor CAMS IAR's recommends to clients, or buys or sells for client accounts, securities in which they have a material financial interest.
- C. Management persons or CAMS IAR's may invest in the same securities (or related securities) that are recommended to clients, or bought and sold by clients. This may present a conflict of interest, but client orders are placed prior to the personal trade and are given preference to eliminate front running. The firm requires management persons and IAR's to report personal transactions to mitigate these conflicts.
- D. Management persons or CAMS IAR's may recommend securities to clients, or buy and sell securities for client accounts, at or about the same time that they buy or sell securities for their own accounts. Client transactions are effected first. Portfolio managers are forbidden to act upon insider information. The firm requires management persons and IAR's to report personal transactions to mitigate these conflicts.

## 12. Brokerage Practices

- A. Client transactions occur at Charles Schwab & Co. or through a broker-dealer chosen by CAMS ("Service Providers"). When choosing where accounts are held and where

transactions will be placed, CAMS will use its best efforts to provide clients with the best solution at the lowest cost.

Clients should be aware that there is no direct link between Service Providers and CAMS in connection with the advice CAMS gives to clients. CAMS receives economic benefits through the custody and operating relationships it has with Service Providers that are not typically available to retail investors. These benefits include the following products and services, provided to CAMS without cost or at a discount: duplicate client statements and confirmations, research related products and tools, consulting services, access to a trading desk serving Representatives, access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares directly to or from 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, and discounts or no fees on compliance, marketing, research, technology, and practice management products and services provided by third-party vendors. Service Providers may also pay for business consulting, professional services, and research received by CAMS affiliated persons and may also pay or reimburse expenses (travel, lodging, meals, and entertainment expenses) for CAMS personnel to attend conferences or meetings relating to their service platforms or to their advisor custody and brokerage services generally. Some of these products and services made available by Service Providers, may benefit CAMS, but may not benefit its clients. Such other services made available by Service Providers are intended to help CAMS manage and further develop its business enterprise, and such services may or may not depend on the amount of brokerage transactions directed to them.

Clients should be aware that the receipt of economic benefits by CAMS described above, in and of itself, creates a potential conflict of interest and may directly or indirectly influence CAMS' recommendation of those service providers for custody and brokerage service.

Other than the services described above, CAMS and its Representatives do not direct transactions and the commissions they generate (soft dollars) to brokerage firms or other parties to receive research or other benefits.

CAMS does not process transactions through Service Providers in return for Service Providers referring new clients to CAMS.

- B. The purchases and sales of securities are combined with similar orders for other client accounts as often as possible to allow for possible discounted trading costs, group trading, and efficient portfolio management. When this occurs, clients in the combined order receive an average price.

### **13. Review of Accounts**

- A. Client accounts are reviewed at trade execution for allocation purposes and are randomly reviewed by the CAMS portfolio manager. IAR's are instructed to perform client account reviews on an annual basis.
- B. Account reviews by portfolio managers are often triggered by client meetings, client requests for withdrawal, etc., or simply at random.
- C. Clients receive statements from the account custodian, at least on a quarterly basis and CAMS may provide a quarterly performance report including a detailed transaction history.

### **14. Client Referrals and Other Compensation**

- A. CAMS does not receive any economic benefit from any third party for providing investment advice or other advisory services to our clients.
- B. CAMS may compensate third parties for providing client referrals under use of a solicitor agreement.

## 15. Custody

Clients' accounts are held by a broker-dealer, bank or other qualified custodian. Those custodians send quarterly, or more frequent, statements of account directly to those clients. Clients should carefully review those custodial statements and should carefully compare those custodial statements to the information in those that are received from CAMS.

## 16. Investment Discretion

CAMS accepts discretionary authority to manage securities accounts on behalf of clients based on the Discretionary Investment Management Services Agreement signed at account inception. In this agreement, clients may choose to limit this authority, but most choose not to do so. With discretion, CAMS selects investments to buy and sell, the amounts to buy and sell, and the timing of such transactions.

## 17. Voting Client Securities

- A. CAMS may receive proxies for the client, but does not vote them. Clients may choose to receive the proxies themselves and vote as they wish. Most clients choose not to do so.
- B. If clients choose to vote their own proxies, they will receive them directly from the accounts' custodian.

## 18. Financial Information

- A. If at any time, CAMS were to require or solicit payment of more than \$500 in fees per client, six months or more in advance, a corporate balance sheet for the most recent fiscal year would be included. CAMS does not collect any payments in advance.
- B. CAMS has discretionary authority over its client accounts, and as such is required to disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. No such condition exists.
- C. CAMS has not been the subject of any bankruptcy petition at any time during the past 10 years.

## 19. Requirements for State-Registered Advisers

- A. Principal Executive Officers and management persons:
  - 1. **George Anastasakis**, President
  - 2. **Nicholas E. Anastasakis**, Senior Vice President

Additional information including education and business background can be found on the attached Schedule 2B for each individual.

- B. CAMS is solely engaged in providing investment advice.
- C. Neither CAMS nor CAMS IAR's are compensated with performance-based fees.

- D. Neither CAMS nor any management person have been involved in any of the following events.
1. An award or otherwise being found liable 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 statements, or omissions;
    - c. theft, embezzlement, or other wrongful taking of property;
    - d. bribery, forgery, counterfeiting or extortion; or
    - e. dishonest, unfair, or unethical practices.
  2. An award or otherwise being 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 statements, or omissions;
    - c. theft, embezzlement, or other wrongful taking of property;
    - d. bribery, forgery, counterfeiting or extortion; or
    - e. dishonest, unfair, or unethical practices.
- E. Neither CAMS nor any management person have any relationships or arrangements with any issuer of securities.

## Notice Regarding Treatment of Confidential Information

**Privacy Notice To Our Clients.** CAMS strongly believes in protecting the confidentiality and security of information we collect about you. This notice describes our privacy policy and describes how we treat the information we receive about you.

**Why We Collect And How We Use Information.** When we evaluate your request for our services, provide investment advice to you and process transactions for your account, you typically provide us with certain personal information necessary for these transactions. We may also use that information to offer you other services we provide which may meet your investment needs.

**What Information We Collect.** The personal information we collect may include:

- Name and address;
- Social Security or taxpayer identification number;
- Assets;
- Income;
- Account balance;
- Investment activity;
- Accounts at other institutions.

**How We Protect Information.** We do not sell your personal information to anyone. We treat information about current and former clients and their accounts in a confidential manner. Our employees may access information and provide it to third parties only when completing a transaction at your request or providing our other services to you.

At your request, we may disclose information to attorneys, accountants, lawyers, securities professionals and others to assist us, or them, in providing services to you.

We may also share information with companies that perform services on our behalf, such as the companies that we hire to perform marketing or administrative services. Companies we may hire to provide support services are not allowed to use your personal information for their own purposes. We may make additional disclosures as permitted by law.

We also maintain physical, electronic, and procedural safeguards to protect information. Employees and our professional service representatives are required to comply with our established information confidentiality provisions.

**Access to and Correction of Information.** Generally, upon your written request, we will make available information for your review. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available. If your personal information with us becomes inaccurate, or if you need to make a change to that information, please contact us at the number shown below so we can update our records.

**Further Information.** For additional information regarding our privacy policy, please contact us by writing to us at 1000 W. Wallings Rd. Suite D, Broadview Heights, OH 44147, or calling (877) 514-9477 or (440) 746-0707.

1. Part 2B of Form ADV: Brochure Supplement

This brochure supplement provides information about George Anastasakis that supplements the Cornerstone Asset Management Services, Inc. (CAMS) brochure. You should have received a copy of that brochure. Please contact Nicholas Anastasakis in the home office if you did not receive CAMS' brochure or if you have any questions about the contents of this supplement.

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

**George Anastasakis**  
Investment Advisor Representative

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Date of Brochure: March 1, 2024

## 2. Educational Background and Business Experience:

Born: 1957

Post High School Education:

Cleveland State University, Majoring in Business Administration (1974-1977)

Business Background:

Cornerstone Asset Management Services, Inc., Owner, Investment Advisor Representative (2005-Present)

Ohio Financial, Anastasakis & Associates, Partner, doing business as name for brokerage and insurance business (2002-Present)

Registered Representative of J.W. Cole Financial, Inc. (2007-Present)

MTH Hats, LLC, d.b.a., Mike The Hatter, Owner (2007-Present)

C.M. Hyatt & Associates, Owner/President (2004-Present)

Registered Representative of Questar Capital Corporation (2003-2007)

Investment Adviser Representative of Questar Asset Management Inc (2005-2007)

Registered Representative of PFS Investments Inc (1985-2002)

## 3. Disciplinary Information

Clients can access disciplinary information on registered representatives through the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system. The BrokerCheck link is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

This individual has no disclosable disciplinary events.

## 4. Other Business Activities

A. This individual is actively engaged in an investment-related business and is a registered representative of J.W. Cole Financial, Inc., a broker-dealer, d.b.a. Ohio Financial, Anastasakis & Associates. This individual is also licensed sell insurance products in Ohio through various insurance providers.

1. J.W. Cole Financial, Inc., Ohio Financial, Anastasakis & Associates and CAMS are all independent of one another.
2. This individual may receive commissions, bonuses, or other compensation based on the sale of insurance, securities or other investment products, including distribution or service ("trail") fees from the sale of mutual funds. This practice may give the individual an incentive to recommend investment products based on the compensation received, rather than the client's needs. This conflict of interest is monitored by CAMS supervisors by reviewing suitability of investments to mitigate this conflict.

B. Non-investment related business activities

MTH Hats, LLC, d.b.a., Mike The Hatter, Owner – retail sales

C.M. Hyatt & Associates, Owner – mobile notary services

## 5. Additional Compensation

No other additional compensation is received by this individual for advisory services.

## 6. Supervision



This individual is supervised by the Chief Compliance Officer, Nicholas Anastasakis at the home office.

Mr. Anastasakis and other individuals as he designates, regularly review the accounts for which Mr. Anastasakis provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures.

7. Requirements for State-Registered Advisers

Mr. Anastasakis has not been involved in: (a) any arbitration claim alleging damages in excess of \$2,500 resulting in an award or being found liable; (b) any civil, self-regulatory organization, or administrative proceeding resulting in an award or being found liable; or (c) a bankruptcy petition.

1. Part 2B of Form ADV: Brochure Supplement

This brochure supplement provides information about Nicholas E. Anastasakis that supplements the Cornerstone Asset Management Services, Inc. (CAMS) brochure. You should have received a copy of that brochure. Please contact Nicholas Anastasakis in the home office if you did not receive CAMS' brochure or if you have any questions about the contents of this supplement.

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

**Nicholas E. Anastasakis**  
Investment Advisor Representative

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Fax: (440) 746-1604

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[www.cornerstoneassetmgmt.com](http://www.cornerstoneassetmgmt.com)  
[www.ohiofinancial.net](http://www.ohiofinancial.net)

**Cornerstone Asset Management Services, Inc. (CAMS)**

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Websites: [www.cornerstoneassetmgmt.com](http://www.cornerstoneassetmgmt.com)  
[www.ohiofinancial.net](http://www.ohiofinancial.net)

Date of Brochure: March 1, 2024

## 2. Educational Background and Business Experience:

Born: 1980

### Post High School Education:

Kent State University, Bachelor of Arts in Business Administration, 2002, Cum Laude, Member  
Kent State Honors College, Major in Finance

### Business Background:

Cornerstone Asset Management Services, Inc. Owner, Investment Advisor Representative (2005-Present)

Ohio Financial, Anastasakis & Associates, Partner, doing business as name for brokerage and insurance business (2004-Present)

Registered Representative of J.W. Cole Financial, Inc. (2007-Present)

Registered Representative of Questar Capital Corporation (2005-2007)

Investment Advisor Representative of Questar Asset Management Inc (2004-2007)

Morgan Stanley, Inc., Financial Advisor (2002-2003)

## 3. Disciplinary Information

Clients can access disciplinary information on registered representatives through the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system. The BrokerCheck link is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

This individual has no disclosable disciplinary events.

## 3. Other Business Activities

A. This individual is actively engaged in an investment-related business and is a registered representative of J.W. Cole Financial, Inc., a broker-dealer, d.b.a. Ohio Financial, Anastasakis & Associates.

1. J.W. Cole Financial, Inc., Ohio Financial, Anastasakis & Associates and CAMS are all independent of one another.
2. This individual may receive commissions, bonuses, or other compensation based on the sale of securities, insurance or other investment products, including distribution or service ("trail") fees from the sale of mutual funds. This practice may give the individual an incentive to recommend investment products based on the compensation received, rather than the client's needs. This conflict of interest is monitored by CAMS supervisors by reviewing suitability of investments to mitigate this conflict.

B. Non-investment related business activities

None

## 4. Additional Compensation

No other additional compensation is received by this individual for advisory services.

## 5. Supervision

This individual is supervised by the Chief Compliance Officer, Nicholas Anastasakis at the home office.

Mr. Anastasakis and other individuals as he designates, regularly review the accounts for which Mr. Anastasakis provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures.

6. Requirements for State-Registered Advisers

Mr. Anastasakis has not been involved in: (a) any arbitration claim alleging damages in excess of \$2,500 resulting in an award or being found liable; (b) any civil, self-regulatory organization, or administrative proceeding resulting in an award or being found liable; or (c) a bankruptcy petition.

1. Part 2B of Form ADV: Brochure Supplement

This brochure supplement provides information about Mark A. Suhay that supplements the Cornerstone Asset Management Services, Inc. (CAMS) brochure. You should have received a copy of that brochure. Please contact Nicholas Anastasakis in the home office if you did not receive CAMS' brochure or if you have any questions about the contents of this supplement.

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

**Mark A. Suhay**

Investment Advisor Representative

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[www.ohiofinancial.net](http://www.ohiofinancial.net)

Date of Brochure: March 1, 2024

## 2. Educational Background and Business Experience:

Born: 1957

Post High School Education:

Miami University, BS in Zoology, 1980

Bowling Green State University, MBA coursework, 1979-1981

Business Background:

Cornerstone Asset Management Services, Inc., Investment Advisor Representative (2006-Present)

Ohio Financial, Suhay & Associates, Owner, doing business as name for securities business (2007-Present)

Registered Representative of J.W. Cole Financial, Inc. (2007-Present)

Small/Micro-Cap Equity Trader at Financial America Securities (1984-2007)

## 3. Disciplinary Information

Clients can access disciplinary information on registered representatives through the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system. The BrokerCheck link is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

This individual has no disclosable disciplinary events.

## 4. Other Business Activities

A. This individual is actively engaged in an investment-related business and is a registered representative of J.W. Cole Financial, Inc., a broker-dealer, d.b.a. Ohio Financial, Suhay & Associates.

1. J.W. Cole Financial, Inc., Ohio Financial, Suhay & Associates and CAMS are all independent of one another.
2. This individual may receive commissions, bonuses, or other compensation based on the sale of securities or other investment products, including distribution or service ("trail") fees from the sale of mutual funds. This practice may give the individual an incentive to recommend investment products based on the compensation received, rather than the client's needs. This conflict of interest is monitored by CAMS supervisors by reviewing suitability of investments to mitigate this conflict.

B. Non-investment related business activities

None

## 5. Additional Compensation

No other additional compensation is received by this individual for advisory services.

## 6. Supervision

This individual is supervised by the Chief Compliance Officer, Nicholas Anastasakis at the home office.

Mr. Anastasakis and other individuals as he designates, regularly review the accounts for which Mr. Suhay provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures.

7. Requirements for State-Registered Advisers

Mr. Suhay has not been involved in: (a) any arbitration claim alleging damages in excess of \$2,500 resulting in an award or being found liable; (b) any civil, self-regulatory organization, or administrative proceeding resulting in an award or being found liable; or (c) a bankruptcy petition.

1. Part 2B of Form ADV: Brochure Supplement

This brochure supplement provides information about Pamela L. Kruger that supplements the Cornerstone Asset Management Services, Inc. (CAMS) brochure. You should have received a copy of that brochure. Please contact Nicholas Anastasakis in the home office if you did not receive CAMS' brochure or if you have any questions about the contents of this supplement.

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

**Pamela L. Kruger**  
Investment Advisor Representative

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Website: [www.cornerstoneassetmgmt.com](http://www.cornerstoneassetmgmt.com)

Date of Brochure: March 1, 2024



## 2. Educational Background and Business Experience:

Born: 1964

### Post High School Education:

Cuyahoga Community College, Associates Degree coursework  
LUTCF, Life Underwriter Training Council Fellow designation, 1991  
Completed CFP coursework, 2005 (exam not completed)

### Business Background:

Cornerstone Asset Management Services, Inc., Investment Advisor Representative (2006-Present)  
Kruger Consulting, Inc., Owner doing business as name for securities and insurance business (2000-Present)  
Registered Representative of J.W. Cole Financial, Inc. (2007-Present)  
Investment Advisor Representative of J.W. Cole Advisors, Inc. (January 2017 – Present)  
Registered Representative of Questar Capital Corporation (2005-2007)  
Registered Representative of WRP Investments, Inc. (2001-2004)  
Insurance Representative of Nationwide Insurance Company (1995-2000)  
Life Insurance Sales Rep of Western Southern Life Insurance (1989-1995)

The LUTCF designation granted by The American College after successfully completing the program which requires the candidate to complete coursework in the following: Ethics for the Financial Services Professional, Techniques for Prospecting: Prospect or Perish, Techniques for Exploring Personal Markets, Techniques for Meeting Client Needs, Marketing Financial Services to Women, Essentials of Disability Income Insurance, Essentials of Multiline Insurance Products, Essentials of Business Insurance, Essentials of Long-Term Care Insurance, Essentials of Annuities, Essentials of Life Insurance Products, Foundations of Retirement Planning, Foundations of Investment Planning, and Foundations of Estate Planning and join their local National Association of Insurance and Financial Advisors (NAIFA).

## 3. Disciplinary Information

Clients can access disciplinary information on registered representatives through the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system. The BrokerCheck link is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

This individual has no disclosable disciplinary events.

## 4. Other Business Activities

- A. This individual is actively engaged in an investment-related business and is a registered representative of J.W. Cole Financial, Inc., a broker-dealer, and J.W. Cole Advisors, a registered investment advisor (dually licensed), d.b.a. Kruger Consulting, Inc. This individual is also licensed to sell insurance in Ohio and Florida for various insurance providers.
1. J.W. Cole Financial, Inc., Kruger Consulting, Inc. and CAMS are all independent of one another.
  2. This individual may receive commissions, bonuses, or other compensation based on the sale of insurance, securities or other investment products, including distribution or service ("trail") fees from the sale of mutual funds. This practice may give the individual an incentive to recommend investment products based on the compensation received,

rather than the client's needs. This conflict of interest is monitored by CAMS supervisors by reviewing suitability of investments to mitigate this conflict.

B. Non-investment related business activities

None

5. Additional Compensation

No other additional compensation is received by this individual for advisory services.

6. Supervision

This individual is supervised by the Chief Compliance Officer, Nicholas Anastasakis at the home office.

Mr. Anastasakis and other individuals as he designates, regularly review the accounts for which Ms. Kruger provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures.

7. Requirements for State-Registered Advisers

Ms. Kruger has not been involved in: (a) any arbitration claim alleging damages in excess of \$2,500 resulting in an award or being found liable; (b) any civil, self-regulatory organization, or administrative proceeding resulting in an award or being found liable; or (c) a bankruptcy petition.

1. Part 2B of Form ADV: Brochure Supplement

This brochure supplement provides information about Christine T. Bules that supplements the Cornerstone Asset Management Services, Inc. (CAMS) brochure. You should have received a copy of that brochure. Please contact Nicholas Anastasakis in the home office if you did not receive CAMS' brochure or if you have any questions about the contents of this supplement.

Additional information about Christine T. Bules is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Christine T. Bules**

Investment Advisor Representative

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1720 10<sup>th</sup> Ave S. Ste 4 #410  
Great Falls, MT 59405

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Website: [www.cornerstoneassetmgmt.com](http://www.cornerstoneassetmgmt.com)

Date of Brochure: March 1, 2024

## 2. Educational Background and Business Experience:

Born: 1954

### Post High School Education:

Edinboro State College, B.A., 1976

Cleveland State University, M.B.A., 1984

ChFC, Chartered Financial Consultant, American College, 2003

CASL®, Chartered Advisor for Senior Living American College®, 2008

### Business Background:

Cornerstone Asset Management Services, Inc., Investment Advisor Representative (2006-Present)

Registered Representative of J.W. Cole Financial, Inc. (2010-August 2017)

Registered Representative of Professional Asset Management, Inc. (2007-2009)

Registered Representative of Questar Capital Corporation (2001-2007)

Registered Representative of Next Advisors, Inc. (1997-2000)

The ChFC® designation is granted by The American College after successfully completing the program which requires the candidate to complete 7 required courses including Financial Planning: Process and Environment, Fundamentals of Insurance Planning, Income Taxation, Planning for Retirement Needs, Investments, Fundamentals of Estate Planning and Financial Planning Applications; 2 elective courses; complete three years of full-time business experience; agree to comply with The American College Code of Ethics and Procedures; and complete on-going continuing education requirements.

The CASL® designation is granted by The American College after successfully completing the program which requires the candidate to complete 5 required courses, including Investments, Fundamentals of Estate Planning, Understanding the Older Client, Health & Long-Term Care Financing for Seniors, and Financial Decisions for Retirement. You must also have been granted the ChFC®, RHU®, REBC® or CLF® designation or been advising clients on financial and/or practical matters relating to their retirement years or on issues dealing with aging for at least three to five years, adhere to The College's Code of Ethics and Procedures and complete 15 hours of continuing education every two years with the additional condition that at least 10 of the hours be in course work directly related to the course work required to obtain the designation.

## 3. Disciplinary Information

Clients can access disciplinary information on registered representatives through the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system. The BrokerCheck link is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

This individual has no disclosable disciplinary events.

## 4. Other Business Activities

A. This individual is not actively engaged in an investment-related business.

1. This individual markets and sells fixed products and insurance through various insurance providers. She is licensed in Ohio.
2. This individual may receive commissions, bonuses, or other compensation based on the sale of insurance or other investment products. This practice may give the individual an

incentive to recommend investment products based on the compensation received, rather than the client's needs. This conflict of interest is monitored by CAMS supervisors by reviewing suitability of investments to mitigate this conflict.

- A. Non-investment related business activities  
None

5. Additional Compensation

No other additional compensation is received by this individual for advisory services.

6. Supervision

This individual is supervised by the Chief Compliance Officer, Nicholas Anastasakis at the home office.

Mr. Anastasakis and other individuals as he designates, regularly review the accounts for which Ms. Bules provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures.

7. Requirements for State-Registered Advisers

Ms. Bules has not been involved in: (a) any arbitration claim alleging damages in excess of \$2,500 resulting in an award or being found liable; (b) any civil, self-regulatory organization, or administrative proceeding resulting in an award or being found liable; or (c) a bankruptcy petition.

1. Part 2B of Form ADV: Brochure Supplement

This brochure supplement provides information about Bill Dragolas that supplements the Cornerstone Asset Management Services, Inc. (CAMS) brochure. You should have received a copy of that brochure. Please contact Nicholas Anastasakis in the home office if you did not receive CAMS' brochure or if you have any questions about the contents of this supplement.

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

**Bill Dragolas**  
**Investment Advisor Representative**

Contact Information:  
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Broadview Hts, OH 44147

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**Cornerstone Asset Management Services, Inc. (CAMS)**

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Email: [nanastasakis@cornerstoneassetmgmt.com](mailto:nanastasakis@cornerstoneassetmgmt.com)

Website: [www.cornerstoneassetmgmt.com](http://www.cornerstoneassetmgmt.com)

Date of Brochure: March 1, 2024

## 2. Educational Background and Business Experience:

Born: 1969

Post High School Education:

Case Western Reserve University, 1994, B.S. Aerospace Engineering

Business Background:

Cornerstone Asset Management Services, Inc., Investment Advisor Representative (August 2018 - Present)

GT Securities, Investment Banker (March 2021 – Present)

Citizens Investment Services, Financial Advisor (April 2016 – August 2018)

First Merit Mortgage Services, Mortgage Loan Officer (October 2015 – April 2016)

First Merit Private Bank, Vice President/Client Advisor (October 2014 – October 2015)

Robert Morris Private Equity, LLC,

## 3. Disciplinary Information

Clients can access disciplinary information on registered representatives through the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system. The BrokerCheck link is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

This individual has had a disclosable event(s):

- Date: 06/10/2009, Regulatory action initiated by Ohio Division of Securities against Robert Morris Investment Advisors, LLC. Allegations: Not filing an updated ADV. Resolution date: 06/10/2009, Sanctions: Revocation. Broker Statement: "I was in the process of going out of business and was going to withdraw my ADV when I received the notice to revoke. I was unable to file my ADV for that year due to a technical issue with my password for this RIA. I had another RIA, Robert Morris Capital Management, which I was able to log onto the system and successfully file Form W to withdraw. I wasn't able to log on to withdraw the Robert Morris Investment Advisors RIA, which resulted in the revocation for failure to file form ADV. I did not appeal since I was going out of business."
- Date: 11/18/2013, Financial disclosure. Chapter 7 Bankruptcy filed in Federal Court. United States Bankruptcy Court for Northern District Ohio. Discharged 02/26/2014. Broker Statement: "I was in a real estate related business that was decimated after the crash of 2008, in which I lost all my assets and my income forcing me into bankruptcy."

## 4. Other Business Activities

C. This individual is licensed to sell insurance in Ohio for various insurance providers.

- This individual may receive commissions, bonuses, or other compensation based on the sale of insurance, securities or other investment products. This practice may give the individual an incentive to recommend investment products based on the compensation received, rather than the client's needs. This conflict of interest is monitored by CAMS supervisors by reviewing suitability of investments to mitigate this conflict.

B. Non-investment related business activities

- CK Foundation, 501c3 Non-Profit, Executive Director
  - Compensation: \$0 per month

- Hours Spent: 5 per month

5. Additional Compensation

No other additional compensation is received by this individual for advisory services.

6. Supervision

This individual is supervised by the Chief Compliance Officer, Nicholas Anastasakis at the home office.

Mr. Anastasakis and other individuals as he designates, regularly review the accounts for which Mr. Dragolas provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures.

7. Requirements for State-Registered Advisers

Mr. Dragolas has been involved in: (a) any arbitration claim alleging damages in excess of \$2,500 resulting in an award or being found liable; (b) any civil, self-regulatory organization, or administrative proceeding resulting in an award or being found liable; or (c) a bankruptcy petition as disclosed above in disciplinary events.



1. Part 2B of Form ADV: Brochure Supplement

This brochure supplement provides information about Jay D. McClellan that supplements the Cornerstone Asset Management Services, Inc. (CAMS) brochure. You should have received a copy of that brochure. Please contact Nicholas Anastasakis in the home office if you did not receive CAMS' brochure or if you have any questions about the contents of this supplement.

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

**Jay D. McClellan, CFP, CEP**  
Investment Advisor Representative

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Website: [www.cornerstoneassetmgmt.com](http://www.cornerstoneassetmgmt.com)

Date of Brochure: March 1, 2024

## 2. Educational Background and Business Experience:

Born: 1955

Post High School Education:

B.A. Media and Business, Columbia College – 1977

### **CFP® - Certified Financial Planner - 1988**

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 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:**

Cornerstone Asset Management Services, Inc., Investment Advisor Representative (07/2020-Present)

Secure Asset Management, LLC, Investment Advisor Representative (11/2016 – 07/2020)

Aurora Securities, Inc., Registered Representative (04/2018 – 12/2018)

Concorde Asset Management, LLC, Investment Advisor Representative (09/2012 – 04/2018)

Concorde Investment Services, LLC, Registered Representative (09/2012 – 04/2018)

J.W. Cole Financial, Inc. (05/2007 – 09/2012)

**3. Disciplinary Information**

Clients can access disciplinary information on registered representatives through the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system. The BrokerCheck link is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

This individual has no disclosable disciplinary events.

**4. Other Business Activities**

A. This individual is not actively engaged in an investment-related business.

3. This individual markets and sells fixed products and insurance through various insurance providers. He is licensed in Ohio.

4. This individual may receive commissions, bonuses, or other compensation based on the sale of insurance or other investment products. This practice may give the individual an incentive to recommend investment products based on the compensation received, rather than the client's needs. This conflict of interest is monitored by CAMS supervisors by reviewing suitability of investments to mitigate this conflict.

B. Non-investment related business activities

Asset Management Systems, Inc. – Income tax preparation business along with financial planning and insurance under same name.

**5. Additional Compensation**

No other additional compensation is received by this individual for advisory services.

**6. Supervision**

This individual is supervised by the Chief Compliance Officer, Nicholas Anastasakis at the home office.

Mr. Anastasakis and other individuals as he designates, regularly review the accounts for which Mr. McClellan provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures.

**7. Requirements for State-Registered Advisers**

Mr. McClellan has not been involved in: (a) any arbitration claim alleging damages in excess of \$2,500 resulting in an award or being found liable; (b) any civil, self-regulatory organization, or administrative proceeding resulting in an award or being found liable; or (c) a bankruptcy petition.