



Introduction

D.M. Kelly & Company is a broker-dealer registered with the U.S. Securities and Exchange Commission (SEC), a member of the Financial Industry Regulatory Authority (FINRA), Securities Investor Protection Corporation (SIPC) and Municipal Securities Regulatory Board (MSRB). DMKC Advisory Services, LLC is our wholly owned registered investment advisory firm registered with the U.S. Securities and Exchange Commission.

It is important that our customers understand the differences between brokerage and advisory accounts. The costs and regulations that govern these accounts (and the services that we are able to provide) differ between our brokerage and advisory businesses.

Free and simple tools are available for you to use at [Investor.gov/CRS](https://investor.gov/CRS), a website maintained by the SEC. These tools can provide you with educational materials about broker-dealers, investment advisers, and investing.

This relationship summary provides information that helps you make an informed decision about whether or not to invest with us and will answer the following questions listed in this form.

Terms to know

- A **broker-dealer** is a firm that acts as an intermediary between buyers and sellers of securities for which they will usually receive a commission and may purchase or sell those securities in/out of their own account.
- An **investment adviser** is generally any person or group that provides investment advice or conducts securities analysis in exchange for a fee.

What investment services and advice can you provide me?

D.M. Kelly & Company offers brokerage services and DMKC Advisory Services, LLC offers investment advisory services to retail investors through their separate platforms.

The principal services of D.M. Kelly & Company, a registered securities broker-dealer, are opening accounts and making recommendations to individual, joint, trust, corporate, and retirement accounts based on the client's specific limitations for investment objective, time-horizon and risk tolerance. Products bought or sold in these accounts have a transaction-based fee referred to as commission. Your financial professional may lower the commission based on the complexity of the investment, size of the order, and whether the order is solicited or non-solicited. Your financial professional is obligated to act in your best interest at the time of a recommendation and not put their interests ahead of yours. Ultimately, the decision to buy or sell securities through D.M. Kelly & Company is the responsibility of the client unless discretionary authority has been granted to DMKC Advisory Services. Account monitoring services are not available for D.M. Kelly & Company brokerage accounts.

DMKC Advisory Services, LLC, a registered investment adviser, is the wholly owned affiliate of D.M. Kelly & Company. DMKC Advisory Services, LLC offers investment advice for a fee, based on your portfolio (assets under management) and referred to as asset-based fee services. DMKC Advisory Services, LLC advises individuals, corporations, businesses and charitable organizations. Additional detailed information about these services may be found on our website and ADV available at <https://www.dmkc.com/disclosure>.

Brokerage Services

D.M. Kelly & Company makes recommendations and executes orders for the buying and selling of securities and insurance products to retail investors. We do not sell proprietary products. The primary service we provide through D.M. Kelly & Company is our trading capacity. A commission is received for the purchase or sale of products including municipal securities, corporate bonds, fixed income securities, equities, exchange traded funds (ETFs) and CDs. Mutual funds are sold by prospectus and carry either a one-time, front-end load (upfront commission), or a level load (an annual expense fee) for as long as you own the fund. Within your D.M. Kelly & Company brokerage account, we may also provide other incidental services such as research reports and newsletters.

In a brokerage services relationship, we can trade with you for our own account, for an affiliate or for another client, and we can earn a profit on those trades. You, the retail investor, have total investment authority for your own account. You may accept or reject any recommendation. The investment recommendations made through our financial professionals are based upon a combination of your unique stated risk tolerances, goals and instructions. Instances in which we are the other party to a trade are disclosed on your D.M. Kelly & Company trade confirmation. However, we are not required to communicate our trading activity in advance, obtain your consent, or inform you of any profit earned on trades.

Some types of brokerage accounts have minimum account activity requirements and/or minimum ongoing balance requirements that must be maintained. Your brokerage account may have transaction fees, charged at the time of each transaction, and may pay an annual fee, or be closed if inactive. These requirements are detailed in the account agreement(s) you receive when you open your brokerage account. You may also pay additional service fees charged against your account to transfer funds or securities (See Other Fees and Costs). Account monitoring services are not available for D.M. Kelly & Company brokerage accounts.

In a brokerage services relationship, if the account is a retirement plan account, Individual Retirement Account ("IRA") or Education Savings

Account ("ESA"), we are "fiduciaries" within the meaning of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code (the "Code"). Please see "Acknowledgement of our Fiduciary Status with respect to Retirement Accounts," below, for more information. We are not fiduciaries within the meaning of ERISA or the Code in other brokerage services relationships.

Investment Advisory Services

DMKC Advisory Services, LLC specializes in providing portfolio management services and providing clients with ongoing supervision over their accounts. We implement a customized and individualized investment program for each client applying our investment strategy and philosophy. We actively manage your investment portfolio in accordance with your specific needs, return objectives and risk tolerance.

The nature and extent of the specific services we perform through DMC Advisory Services, LLC include our exercise of trading authority and our ongoing supervision over client accounts. You must sign our advisory agreement to grant your Investment Adviser Representative discretionary or non-discretionary trading authorization over your account. Trading authority allows us the ability to make trades in your account. Such authorization may be provided on a discretionary or non-discretionary basis depending on your individual needs and requests.

- Discretionary authority provides the ability to make trades in your account without contacting you prior to each trade.
- When non-discretionary trading authority is granted, we must get your approval prior to making any changes in your account.
- Discretionary and non-discretionary trading authorization must be granted by each client, in writing, in our service agreement.

We offer various programs, some exclusively with discretionary authority and others with optional non-discretionary authority. The programs differ in their objectives, strategies, securities held and, in some cases, use of outside managers. Some programs offer clients asset allocation models primarily using mutual fund and ETF investments. Other programs allow more customization in your portfolio, including an equity strategy, fixed income investments, or a blend of both. Some programs utilize a third-party money manager. You may impose restrictions on the securities or types of securities in which you would like us to invest. We monitor your account at least quarterly. We will offer you advice on a regular basis and contact you at least annually to discuss your portfolio. The minimum account size depends on the program selected and ranges from a \$50,000 minimum to a \$500,000 minimum. Programs also carry a minimum fee ranging from \$200 to \$1,000.

Financial planning may include advice on retirement, education, tax planning, survivorship issues, disability, asset allocation and estate planning. The financial plan is not intended as a comprehensive financial plan covering every possible aspect of your financial affairs. It is intended cover those financial issues and decisions typically important to most clients. In the implementation of the financial plans, you retain the actual responsibility and authority to implement recommendations in the financial plan. However, we may assist in the implementation at the request of the client.

For additional information, please see our Form ADV Part 2A brochure Items 4 and 7, which is available online at: <https://adviserinfo.sec.gov/firm/summary/145112>

Conversation Starters - ask your financial professional:

- Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

What fees will I pay?

Fees are different for Brokerage and Advisory services. Whichever services you select, you will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Commissions vs. Advisory Fees

If you select a brokerage services relationship (in which you will pay commissions), you would be charged more when there is heavier trading activity, and the firm may therefore have an incentive to encourage you to trade often. However, in brokerage services account, without a transaction, you do not have further transaction cost. This could lower your annual expense.

Using an advisory account (in which you will pay an asset-based fee) you still may incur a higher annual cost because you will incur both the continual quarterly fee for assets under management plus any transaction fees.

Depending on a number of factors including account size, trading habits, complexity and quantity of securities purchased or sold, the total cost to you under a fee-based account versus a commission account can vary significantly.

Conversation Starters - ask your financial professional:

- Help me understand how these fees and costs might affect my investments.
- If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

Other Fees in Brokerage Services Accounts

In addition to the firm's principal fees, costs and commissions disclosed above, the retail investor may pay additional fees, either directly or indirectly. Direct compensation is taken directly from the account. Indirect compensation is compensation paid in ways other than directly from the account and may impact the value of the associated investments in your account. Additionally, some of these fees may not apply to older,

grandfathered accounts.

Common examples of direct additional fees include, but are not limited to the following: Account Assistance and Research, which may be billed hourly; Account Transfer to Another Firm or Account Closing; Annual Inactive Account and Maintenance; Advantage Account Annual; Checks Returned or Stop Payment; Delivery of Securities (excluding Delivery Versus Payment accounts); Extensions; Mutual Fund Redemptions; Online Trades; Transaction Minimum including Postage and Handling; Rejection of Ineligible Physical Certificates Presented for Deposit; Reorganizations; Replacement of Securities Lost by Customer; Retirement Accounts Annual or Termination fee; Rush Withdrawal Registration; Transfers or Re-Registration of Physical Certificates; UGMA or UTMA Account Annual; Domestic Wire Transfers; Duplicate and Replacement Statements.

Common examples of indirect additional fees include but are not limited to the following: mutual fund fees; variable annuity fees; and other transactional fees charged by a fund sponsor or product sponsor. Under a new DOL rule, applying to retirement accounts governed by ERISA and/or Code, including IRAs and ESAs, your financial professional may earn mutual fund trailing fees, provided the cost is not paid by the participant, you.

D.M. Kelly & Company's Client Fee Schedule is delivered annually to clients and is available at <https://www.dmkc.com/disclosure>. Please see the Client Fee Schedule disclosure for more information.

Commissions and Other Fees in Investment Advisory Services Accounts

The total cost to you under a fee-based investment advisory services account is stated in the investment advisory agreement and can vary based on account size, amount of transactions, and type and quantity of securities purchased or sold. Fees are charged quarterly, in advance, to your account. DMKC Advisory Services, LLC management advisory fees will not cover ticket charges and any other transaction fees relating to the execution of securities transactions within client accounts. Brokerage fees and expenses are charged separately by D.M. Kelly & Company and the clearing firm and are billed directly to the client's account.

In addition, clients may incur certain charges imposed by third parties other than DMKC Advisory Services, LLC in connection with investments made through the investment advisory services account, including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, and IRA and qualified retirement plan fees. Management fees charged by DMKC Advisory Services, LLC are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to clients. A description of these fees and expenses are available in each investment company prospectus.

For financial planning services the fee usually ranges between \$250 and \$5,000 depending on the complexity of your financial situation and your requirements. The fee is determined when we enter into the financial planning agreement with you and is payable at the time of the presentation of the financial plan.

For additional information, please see our Form ADV Part 2A brochure Item 5 and 12, which is available online at: <https://adviserinfo.sec.gov/firm/summary/145112>

Additional Fees and Costs

Certain additional fees separate from brokerage trade execution fees may be charged by D.M. Kelly & Company and/or the clearing firm and passed through to the client. D.M. Kelly & Company reserves the right to change or add fees at any time with a 30-day notice. All non-trade related fees listed on the D.M. Kelly & Company Client Fee Schedule are considered separate and additional services provided.

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does the firm make money and what conflicts of interest do you have?

Standard of Conduct

When we provide you with a recommendation as your broker-dealer or act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice we provide you. Here are some examples to help you understand what this means:

Acknowledgement of our Fiduciary Status with respect to Retirement Accounts

When we provide "investment advice," as defined under Title I of ERISA or the Code, to you regarding your retirement plan account, IRA, or ESA, we are **fiduciaries** within the meaning of ERISA and/or the Code. The way we make money creates some conflicts with your interests, so when we operate as a fiduciary for your retirement account(s) we operate under a special rule, **PTE 2020-02**, that requires us to act in your best interest and not put our interest ahead of yours. To the extent that particular communications to you or activities are considered "investment education" or otherwise non-fiduciary under ERISA, we are not a fiduciary in connection with such communications or activities.

The Department of Labor has published a guide titled Choosing the Right Person to Give You Investment Advice: Information for Investors in Retirement Plans and Individual Retirement Accounts, found at: <https://www.dol.gov/agencies/ebsa/about-ebsa/our->

Conversation Starters - ask your financial professional:

- How might your conflicts of interest affect me, and how will you address them?

Examples of Ways We Make Money and Conflicts of Interest

Our financial professionals are compensated following a combined, tiered-production payout, which is based on monthly earning with an annual reset.

Transaction-Based Compensation Conflicts

In your brokerage account you pay certain fees (commissions/sales charges) in connection with the buying and selling of each investment product. Where these fees apply, the more transactions you enter into, the more compensation that the firm and your financial professional receives. Additionally, a "principal" transaction, in which we are the purchaser or seller on the other side of your trade, creates the potential for us to charge a markup on the securities you buy or sell, in addition to the commission fees charged. Principal transactions may also mean that we do not seek better prices in the market. A transaction-based compensation arrangement creates an incentive for us to recommend that you buy and sell, rather than hold, your investments. We also may have an incentive to recommend that you purchase investment products that carry higher fees, instead of products that carry lower or no fees.

Fee-Based Compensation Conflicts

In your Investment Advisory Account, you pay certain fees based upon assets under management. Where these fees apply, the larger the assets under management, the more compensation that the firm and your financial professional receive. This compensation, which is ongoing for the life of the account, creates an incentive for us to recommend that you choose an Investment Advisory relationship versus a transaction-based brokerage account. For Reg BI Disclosures that explain this conflict in more detail, see <https://www.dmkc.com/disclosure>.

For additional information, please see our Form ADV Part 2A brochure Items 5, 10, and 12, which is available online at: <https://adviserinfo.sec.gov/firm/summary/145112>

How do your financial professionals make money?

D.M. Kelly & Company and DMKC Advisory Services utilize a combined compensation payout grid to compensate financial professionals for the investment advisory programs and brokerage products and transactions, including (but not limited to) investment advisory fees, equity transaction commissions, fixed-income transaction commissions, and insurance commissions. A financial professional's payout level is determined by his or her prior year's total sales production. Some miscellaneous expenses are passed through to financial professionals. These include (but are not limited to) state license fees, industry and trade publications and association dues. We do not engage in the practice of sales contests. We offer mutual funds that pay 12b-1 fees and will pay our financial professionals for these approved 12b-1 fees from a sponsor. DMKC Advisory Services, LLC does not utilize mutual funds that pay 12b-1 fees. However, positions transferred into investment advisory services accounts may generate 12b-1 fees, but these fees are not paid to financial professionals.

Your financial professional is not compensated on cash sweep balances in money market accounts. However, D.M. Kelly & Company is compensated on cash sweep balances in money market accounts. This compensation takes the form of revenue sharing through the clearing firm. DMKC Advisory Services, LLC is not compensated on cash sweep balances in money market accounts. We may receive compensation for margin account balances in both brokerage and advisory accounts.

The firm may act in a "principal" capacity in effecting trades. A principal trade is a type of order in which D.M. Kelly & Company is the purchaser or seller on the other side of your trade. D.M. Kelly & Company engages in principal transactions from its own account and at its own risk.

We and your financial professional may receive commissions from insurance companies for the sale of annuities, as well as trail commissions on these sales. These payments are considered indirect compensation and may vary by product type and may vary by insurance carrier.

Conversation Starters - ask your financial professional:

- As a financial professional, do you have any disciplinary history? For what type of conduct?
- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

Do you or your financial professionals have legal or disciplinary history?

Yes. Visit Investor.gov/CRS for a free and simple search tool to research us and financial professionals.

Where can I find additional information?

You can always ask your financial professional for more information and request a copy of this relationship summary at no charge by calling us at 515-221-1133 or by contacting our Chief Compliance Officer at 3900 Ingersoll Avenue, Suite 300, Des Moines, IA 50312. Our Customer Relationship Summary (CRS) is available online at: <https://adviserinfo.sec.gov/firm/summary/145112>

Exhibit 1

We changed all instances of:

Financial Advisors or Financial Professionals

To:

financial professionals

We changed the following sentence from:

The principal services of D.M. Kelly & Company are opening and making recommendations to individual, joint, trust, corporate, and retirement accounts based on the client's specific limitations for investment objective, time-horizon and risk tolerance.

To:

The principal services of D.M. Kelly & Company, a registered securities broker-dealer, are opening accounts and making recommendations to individual, joint, trust, corporate, and retirement accounts based on the client's specific limitations for investment objective, time-horizon and risk tolerance.

We changed the following sentence from:

Ultimately, the decision to buy or sell securities through D.M. Kelly & Company is the responsibility of the client.

To:

Ultimately, the decision to buy or sell securities through D.M. Kelly & Company is the responsibility of the client unless discretionary authority has been granted to DMKC Advisory Services.

We removed the following paragraph:

D.M. Kelly & Company has established a clearing agreement with First Clearing¹. Since D.M. Kelly & Company and DMKC Advisory Services, LLC are under common ownership and have some of the same executive officers and supervisors, the decision to use First Clearing was mutually determined for both companies. Wells Fargo Clearing Services, LLC and First Clearing are not affiliated with D.M. Kelly & Company or DMKC Advisory Services, LLC.

We changed the following paragraph from:

DMKC Advisory Services, LLC, a Registered Investment Advisory firm, is the wholly owned affiliate of D.M. Kelly & Company offering investment advice for a fee, based on your portfolio (assets under management) and referred to as asset-based fee services. DMKC Advisory Services, LLC advises individuals, corporations, businesses and charitable organizations. Additional detailed information about these services may be found on our website, <https://www.dmkc.com/disclosure>.

To:

DMKC Advisory Services, LLC, a registered investment adviser, is the wholly owned affiliate of D.M. Kelly & Company. DMKC Advisory Services, LLC offers investment advice for a fee, based on your portfolio (assets under management) and referred to as asset-based fee services. DMKC Advisory Services, LLC advises individuals, corporations, businesses and charitable organizations. Additional detailed information about these services may be found on our website and ADV available at <https://www.dmkc.com/disclosure>.

We changed the following sentence from:

As a broker-dealer, D.M. Kelly & Company makes recommendations and executes orders for the buying and selling of securities and insurance products to retail investors.

To:

D.M. Kelly & Company makes recommendations and executes orders for the buying and selling of securities and insurance products to retail investors.

We changed the following sentence from:

The primary service we provide is our trading capacity.

To:

The primary service we provide through D.M. Kelly & Company is our trading capacity.

We changed the following sentence from:

Within your brokerage account, we may also provide other incidental services such as research reports and newsletters.

To:

Within your D.M. Kelly & Company brokerage account, we may also provide other incidental services such as research reports and newsletters.

We changed the following sentence from:

Instances in which we are the other party to a trade are disclosed on your trade confirmation.

To:

Instances in which we are the other party to a trade are disclosed on your D.M. Kelly & Company trade confirmation.

We changed the following sentence from:

The nature and extent of the specific services we perform through DMKC Advisory Services, LLC are as a Fiduciary, with trading authority and ongoing supervision over client accounts.

To:

The nature and extent of the specific services we perform through DMKC Advisory Services, LLC include our exercise of trading authority and our ongoing supervision over client accounts.

We changed the following paragraphs from:

ATLAS ACCOUNTS will allow discretionary or non-discretionary authority. ATLAS PROGRAM accounts are designed to be an open architecture of a variety of securities. There is a \$500,000 minimum account size and a minimum annual fee of \$1,000. This program allows more customization in your portfolio's composition and transaction timing. Your Financial Advisor will help tailor this portfolio and you may or may not grant them discretionary trading authority. The ATLAS Program is a proprietary program we have developed. Account monitoring services are available for DMKC Advisory Services Accounts. Please discuss with your Financial Advisor the benefits and limitations of this service.

All ANCHOR ACCOUNTS will allow discretionary authority. ANCHOR PROGRAM accounts offer clients five asset allocation models on a discretionary basis. There is a \$50,000 minimum account size and a minimum annual fee of \$200. The models primarily use mutual fund and ETF investments. The ANCHOR Program has an Investment Team to create, update, periodically re-balance and monitor the model portfolios.

All ALLIED ACCOUNTS will allow discretionary authority. ALLIED PROGRAM accounts offer certain clients an equity strategy on a discretionary basis that meets the client's risk objective and utilizes a third-party money manager. There is a \$1,000,000 minimum account size and a minimum annual fee of \$1,000.

You may get additional detailed information about advisory services and programs on our website, dmkc.com/advisory or by requesting a copy of our ADV Part 2A.

To:

We offer various programs, some exclusively with discretionary authority and others with optional non-discretionary authority. The programs differ in their objectives, strategies, securities held and, in some cases, use of outside managers. Some programs offer clients asset allocation models primarily using mutual fund and ETF investments. Other programs allow more customization in your portfolio, including an equity strategy, fixed income investments, or a blend of both. Some programs utilize a third-party money manager. You may impose restrictions on the securities or types of securities in which you would like us to invest. We monitor your account at least quarterly. We will offer you advice on a regular basis and contact you at least annually to discuss your portfolio. The minimum account size depends on the program selected and ranges from a \$50,000 minimum to a \$500,000 minimum. Programs also carry a minimum fee ranging from \$200 to \$1,000.

Financial planning may include advice on retirement, education, tax planning, survivorship issues, disability, asset allocation and estate planning. The financial plan is not intended as a comprehensive financial plan covering every possible aspect of your financial affairs. It is intended cover those financial issues and decisions typically important to most clients. In the implementation of the financial plans, you retain the actual responsibility and authority to implement recommendations in the financial plan. However, we may assist in the implementation at the request of the client.

For additional information, please see our Form ADV Part 2A brochure Items 4 and 7, which is available online at: <https://adviserinfo.sec.gov/firm/summary/145112>

We deleted the following sentence:

What are the differences between a Financial Professional, Financial Advisor or Investment Adviser Representative?

We deleted the following sentence:

You should have a conversation with your Financial Advisor or Financial Professional and read the Form ADV Brochure.

We changed the following sentence from:

The total cost to you under a fee-based account is stated in the investment advisory agreement and can vary based on account size, amount of transactions, and type and quantity of securities purchased or sold.

To:

The total cost to you under a fee-based investment advisory services account is stated in the investment advisory agreement and can vary based on account size, amount of transactions, and type and quantity of securities purchased or sold.

We changed the following sentence from:

Investment advisory fees and expenses are charged separately by D.M. Kelly & Company and Wells Fargo Clearing Services LLC and are billed directly to the client's account.

To:

Brokerage fees and expenses are charged separately by D.M. Kelly & Company and the clearing firm and are billed directly to the client's account.

We changed the following sentence from:

In addition, clients may incur certain charges imposed by third parties other than DMKC Advisory Services, LLC in connection with investments made through the account, including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, and IRA and qualified retirement plan fees.

To:

In addition, clients may incur certain charges imposed by third parties other than DMKC Advisory Services, LLC in connection with investments made through the investment advisory services account, including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, and IRA and qualified retirement plan fees.

We added the following paragraphs:

For financial planning services the fee usually ranges between \$250 and \$5,000 depending on the complexity of your financial situation and your requirements. The fee is determined when we enter into the financial planning agreement with you and is payable at the time of the presentation of the financial plan.

For additional information, please see our Form ADV Part 2A brochure Item 5 and 12, which is available online at:
<https://adviserinfo.sec.gov/firm/summary/145112>

We changed the following sentence from:

Certain additional fees separate from brokerage trade execution fees may be charged by D.M. Kelly & Company and First Clearing Services and passed through to the client.

To:

Certain additional fees separate from brokerage trade execution fees may be charged by D.M. Kelly & Company and/or the clearing firm and passed through to the client.

We changed the following sub-heading from:

Transaction-Based Conflicts

To:

Transaction-Based Compensation Conflicts

We changed the following sentence from:

Additionally, a principal transaction, in which we are the party on the other side of your trade, creates the potential for the firm to charge a markup in addition to the commission fees charged.

To:

Additionally, a "principal" transaction, in which we are the purchaser or seller on the other side of your trade, creates the potential for us to charge a markup on the securities you buy or sell, in addition to the commission fees charged.

We changed the following sentence from:

This compensation creates an incentive for us to recommend that you buy and sell, rather than hold, these investments.

To:

A transaction-based compensation arrangement creates an incentive for us to recommend that you buy and sell, rather than hold, your investments.

We changed the following sub-heading from:

Fee Based Conflicts

To:

Fee-Based Compensation Conflicts

We changed the following sentence from:

For additional information about potential conflicts of interest, please see Form ADV and Reg BI Disclosures at <https://www.dmkc.com/disclosure>.

To:

For Reg BI Disclosures that explain this conflict in more detail, see <https://www.dmkc.com/disclosure>.

For additional information, please see our Form ADV Part 2A brochure Items 5, 10, and 12, which is available online at: <https://adviserinfo.sec.gov/firm/summary/145112>

We changed the following sentences from:

D.M. Kelly & Company and DMKC Advisory Services utilize the same compensation payout grid for the Anchor and Atlas programs (the Allied program is less) and products sold including (but not limited to); equity transaction commissions, fixed-income transaction commissions, and insurance commissions. A Financial Advisor or Financial Professional's payout level is determined by their prior year's total sales production.

To:

D.M. Kelly & Company and DMKC Advisory Services utilize a combined compensation payout grid to compensate financial professionals for the investment advisory programs and brokerage products and transactions, including (but not limited to) investment advisory fees, equity transaction commissions, fixed-income transaction commissions, and insurance commissions. A financial professional's payout level is determined by his or her prior year's total sales production.

We changed the following sentence from:

DMKC Advisory Services, LLC does not utilize mutual funds that pay 12b-1 fees; however, positions transferred into Advisory services accounts may generate 12b-1 fees but are not paid to Financial Advisors.

To:

DMKC Advisory Services, LLC does not utilize mutual funds that pay 12b-1 fees. However, positions transferred into investment advisory services accounts may generate 12b-1 fees, but these fees are not paid to financial professionals.

We changed the following paragraphs from:

Your Financial Advisor or Financial Professional is not compensated on cash sweep; however, the broker-dealer is compensated on cash sweep balances via Money Market accounts through revenue sharing. DMKC Advisory Services, LLC is not compensated on cash sweep balances. We may receive compensation for margin account balances in both brokerage and advisory.

The firm may act in a Principal capacity in effecting trades. A principal trade is a type of order carried out by the firm that involves buying or selling from its own account and at its own risk.

We and your Financial Advisor or Financial Professional may receive commissions from insurance companies for the sale of annuities, as well as trail commissions. They are considered indirect compensation and may vary by product type and may vary by insurance carrier.

To:

Your financial professional is not compensated on cash sweep balances in money market accounts. However, D.M. Kelly & Company is compensated on cash sweep balances in money market accounts. This compensation takes the form of revenue sharing through the clearing firm. DMKC Advisory Services, LLC is not compensated on cash sweep balances in money market accounts. We may receive compensation for margin account balances in both brokerage and advisory accounts.

The firm may act in a "principal" capacity in effecting trades. A principal trade is a type of order in which D.M Kelly & Company is the purchaser or seller on the other side of your trade. D.M. Kelly & Company engages in principal transactions from its own account and at its own risk.

We and your financial professional may receive commissions from insurance companies for the sale of annuities, as well as trail commissions on these sales. These payments are considered indirect compensation and may vary by product type and may vary by insurance carrier.

We deleted the following sentence:

Ask your Financial Advisor or Financial Professional for more details regarding 12b-1 fees.

We changed the following paragraph from:

No Financial Advisor or Financial Professional of either division has a legal or disciplinary history. D.M. Kelly & Company has a regulatory event from 2011 disclosed on Form BD. DMKC Advisory Services, LLC has no legal or disciplinary history on Form ADV. For reference go to <https://www.investor.gov/CRS> which is a free tool maintained by the SEC to research the background and experience of financial brokers, advisers and firms.

To:

Yes. Visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and financial professionals.

We changed the following sentence from:

Our Customer Relationship Summary (CRS) is available on our website: <https://www.dmkc.com/disclosure>.

To:

Our Customer Relationship Summary (CRS) is available online at: <https://adviserinfo.sec.gov/firm/summary/145112>