

Keller Wealth Advisors

**101 S. Main St. Suite 300
Victoria, TX 77901**

**Phone 361 573-4383
Fax 361 573-1168**

**www.kellerwealthadvisors.com
mail@kellerwealthadvisors.com**

October 29, 2024

FORM ADV PART 2 BROCHURE

This brochure provides information about the qualifications and business practices of Keller Wealth Advisors. If you have any questions about the contents of this brochure, please contact us at (361) 573-4383 or mail@kellerwealthadvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Keller Wealth Advisors is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Keller Wealth Advisors is 111610.

Keller Wealth Advisors is an investment adviser registered with the United States Securities and Exchange Commission. Registration does not imply a certain level of skill or training.

Summary of Material Changes

No material changes have been made to this Brochure since the last update of the Brochure dated March 15, 2024.

Other non-material changes have been made to this Brochure. As such, we encourage you to read this Brochure in its entirety.

Table of Contents

<i>Summary of Material Changes</i>	<i>i</i>
<i>Table of Contents</i>	<i>ii</i>
<i>Advisory Business</i>	<i>1</i>
<i>Fees and Compensation</i>	<i>2</i>
<i>Performance-Based Fees and Side-By-Side Management</i>	<i>3</i>
<i>Types of Clients</i>	<i>3</i>
<i>Methods of Analysis, Investment Strategies and Risk of Loss</i>	<i>3</i>
<i>Disciplinary Information</i>	<i>4</i>
<i>Other Financial Industry Activities and Affiliations</i>	<i>4</i>
<i>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</i>	<i>4</i>
<i>Brokerage Practices</i>	<i>5</i>
<i>Review of Accounts</i>	<i>8</i>
<i>Client Referrals and Other Compensation</i>	<i>8</i>
<i>Custody</i>	<i>8</i>
<i>Investment Discretion</i>	<i>9</i>
<i>Voting Client Securities</i>	<i>9</i>
<i>Financial Information</i>	<i>9</i>

Advisory Business

Form ADV Part 2A, Item 4

Keller Wealth Advisors has been a SEC registered investment advisor since 1998. KMH Wealth Management, LLC doing business as (“DBA”) Keller Wealth Advisors is a Limited Liability Company whose managing members and principal owners are Kyle Noack, Thomas Lane Keller, and David Faskas. Keller Wealth Advisors previously operated under the names KMH Wealth Management, LLC (2008-2023) and Keller & Associates, CPAs (1998-2008).

Keller Wealth Advisors is an independent, Fee-Only advisory firm that offers Wealth Management, Investment Advisory Services and Financial Planning services to its clients. Because Keller Wealth Advisors is a Fee-Only firm, it is committed to its role as a fiduciary on behalf of its clients. As a fiduciary Keller Wealth Advisors recommends investment products from the universe of investment options that it believes are in line with its client’s investment goals.

Investment Advisory Services, a service that forms part of Keller Wealth Advisors’ wealth management services, are intended to ensure that financial products recommended for such clients are based upon, among other things, a client’s lifestyle/life stage, financial goals, risk tolerance and tax situation. Keller Wealth Advisors generally takes a long-term approach to investing and believes in a portfolio generally consisting primarily of mutual funds, bonds, and annuities. Portfolios are rebalanced regularly and when a client advises Keller Wealth Advisors of changes in their financial situation, or based on market conditions or economic factors. Clients are advised of their responsibility to promptly notify Keller Wealth Advisors of changes in their financial situation or investment objectives.

Keller Wealth Advisors manages investment advisory accounts by reviewing client assets held at brokerages or custodians and implementing asset allocation strategies, risk analysis and diversification. If clients would like to impose restrictions on investing, such as only investing in certain securities or certain market segments, Keller Wealth Advisors will work with the client to accommodate these requests.

Keller Wealth Advisors offers a broad range of financial planning services to its investment advisory clients through its professionals who are CERTIFIED FINANCIAL PLANNER™ professionals. These services generally include cash flow management, tax planning, education planning, asset protection, estate and gift planning, retirement planning, multi-generational planning, inheritance, charitable giving and insurance planning. Keller Wealth Advisors also offers personal financial planning as a stand-alone service under a separate engagement for investors not seeking investment advisory services.

Keller Wealth Advisors through its wealth management services and financial planning services designs financial plans and portfolios based on the client’s individual needs. This client specific planning is intended to assist clients in charting paths towards financial security.

Keller Wealth Advisors does not participate in wrap fee programs.

As of December 31, 2023, Keller Wealth Advisors had approximately \$703,894,000 in regulatory assets under management. Of this amount, Keller Wealth Advisors manages approximately \$692,601,000 on a discretionary basis and the remaining \$11,293,000 on a non-discretionary basis.

Fees and Compensation






Form ADV Part 2A, Item 5

Keller Wealth Advisors is compensated for its investment advisory services based on a percentage of assets under management, as set forth below. Accounts of members of the same household and other related accounts may be consolidated for fee calculation purposes.

The annual fees for investment advisory services are typically calculated and paid, in advance, on a quarterly basis, based on the fair market value of assets under management as determined at the end of the last business day of the previous quarter. Clients may elect to either have the fees deducted from their accounts or be invoiced for such fees. Advisory fees are generally negotiable, at the discretion of Keller Wealth Advisors.

Assets Under Management Fee Schedule

*Minimum annual fee: \$4,000**

	0.80%	➤	on the first \$1,000,000
	0.60%	➤	on amounts over \$1,000,000 up to \$3,000,000
	0.40%	➤	on amounts over \$3,000,000 up to \$5,000,000
	0.20%	➤	on amounts over \$5,000,000 up to \$10,000,000
	0.15%	➤	on amounts over \$10,000,000

*Financial Planning is included in annual fees***

529 Plans:
0.25%

Individual Fixed Income (Including CDs):
Additional 0.13%

Cash & Treasury Bills:
No Fee

**Non-profit organizations are exempt from minimum fee.*

***Advanced estate planning is not included.*

XY Now Plan services, which provide financial planning services and investment management and advisory services if investible assets exist, to individuals under age 45 with less than \$500,000 in investible assets, are charged a non-refundable \$500 sign-up fee, and a flat fee of \$50 for each month of services thereafter. XY Now Plan fees are paid quarterly, with \$150 deducted from client accounts in advance at the beginning of each calendar quarter. XY Now fees are non-negotiable.

Advanced Estate Planning is available to clients under a separate engagement with Keller Wealth Advisors. The fee for Advanced Estate Planning is charged at our hourly rate of \$100 to \$300 per hour, depending on the complexity of the estate, with a minimum fee of \$2,500, billed separately and not deducted from client accounts.

In addition to the fees charged by Keller Wealth Advisors, clients may incur, and are solely liable for, brokerage commissions, other costs relating to the execution of securities and investment transactions, fees and expenses imposed directly by mutual funds, and fees and charges imposed directly by annuities. The fees and expenses imposed by mutual funds are described in each fund's prospectus, and will generally include a management fee,

other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. Fees and charges imposed by annuities are described in the product's brochure and in the contract, and generally includes surrender charges. Please refer to Item 12 for a more detailed discussion relative to our brokerage arrangements.

All investment management and advisory fees paid are considered fully earned until the terminating party, in accordance with the advisory agreement between Keller Wealth Advisors and the client, delivers a written notice of termination. Upon termination, refunds will be calculated based on how many days remain in the quarter after the written termination is received.

All XY Now Plan fees paid for the month during which notice of termination is provided by either party to the other are considered fully earned. Prepaid fees for any months remaining in the quarter following the month of termination will be returned once a signed termination agreement is received by Keller Wealth Advisors.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

Keller Wealth Advisors does not charge performance-based fees or engage in side-by-side management.

Types of Clients

Form ADV Part 2A, Item 7

Keller Wealth Advisors generally provides investment advice to individuals, high net worth individuals (including trusts and estates), corporations, pension and profit sharing plans, and charitable organizations.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

The main sources of information that Keller Wealth Advisors generally uses to analyze financial products is YCharts, financial newspapers and magazines; research materials prepared by third parties; corporate rating services; and annual reports, prospectuses and filings with the SEC.

Investment strategies the firm generally uses are passively and actively managed asset class mutual funds and direct fixed income obligations. These strategies are employed to capture the return behavior of an entire asset class and based upon the major tenets of Modern Portfolio Theory which states that markets are "efficient" and that the Investor's return is determined principally by asset allocation decisions, not market timing or selection of specific securities. Each client is interviewed to determine his/her specific investment needs and risk tolerance, including, but not limited to: investment purpose, demographic characteristics (age, employment and family), and overall financial situation including taxable income, inheritance, life insurance and risk tolerance. Based on this information, the firm recommends products to assist clients in attaining their financial goals. The highest priority is given to placing the client's interest first.

Keller Wealth Advisors recommends an array of products; however, it primarily recommends mutual funds, bonds, and annuities. Each type of investment has its own unique set of risks that are not always easily identifiable. These risks affect the performance and the volatility of any investment. For example, investments

are affected by general economic and market conditions such as interest rates, availability of credit, inflation rates, economic uncertainty, changes in laws, and national and international political circumstances. Investments are also subject to currency, political and business risks. Significant market disruptions, such as those caused by pandemics, natural or environmental disasters, war, acts of terrorism, or other events, can adversely affect local and global markets and normal market operations. Market disruptions may exacerbate political, social, and economic risks. Most mutual funds fall into one of four broad categories – money market funds, bond funds, equity funds, and balanced funds. Each type has different features and different risks and rewards. There are also risks associated with bond investments, such as default risk and interest rate fluctuations. Depending on the type, annuities can carry unique risks, including costly penalties for early surrender, liquidity risk, and the risk of the annuitant dying before receiving the stream of income they purchased. Variable annuities are also exposed to the aforementioned risks of economic and market conditions. Exchange Traded Funds (ETFs) typically trade intraday, so ETF shares may trade at a discount or premium to their net asset value and therefore have the additional risk of not trading at their net asset value. All investing activities involve risk of loss that clients should be prepared to tolerate, including the possible loss of a client's entire investment and any gains earned thereon. Clients should read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks prior to investing.

Disciplinary Information

Form ADV Part 2A, Item 9

Keller Wealth Advisors does not have any information that is disclosable under this Item 9.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

Keller Wealth Advisors is affiliated with Keller & Associates CPAs, PLLC. Thomas Lane Keller, Kyle W. Noack, and Christopher W. Laughhunn are CPAs with Keller & Associates CPAs, PLLC and provide Keller Wealth Advisors clients with tax and accounting services as requested by the client for additional fees and under a separate engagement through Keller & Associates. Keller Wealth Advisors employees that hold an ownership interest in Keller & Associates have an incentive to recommend services of Keller & Associates to clients of Keller Wealth Advisors, because doing so may increase revenue to Keller & Associates and people associated with that firm. This conflict of interest is addressed via such disclosure and is mitigated by the fact that no client of Keller Wealth Advisors is required to purchase tax and/or accounting services through Keller & Associates and have the option to purchase those services elsewhere.

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

Form ADV Part 2A, Item 11

Keller Wealth Advisors has a Code of Ethics (the "Code") that we will provide to clients or prospective clients upon their request. A summary of the Code is provided in this brochure.

The company is a fiduciary for its investment advisory clients, under the Investment Advisors Act of 1940. When Keller Wealth Advisors provides investment advice to clients regarding retirement plan account(s) or individual retirement account(s), the company is also a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/ or the Internal Revenue Code, as applicable, which are laws governing retirement

accounts. As fiduciaries, the firm is required to put the interests of clients first before the interests of Keller Wealth Advisors. When clients roll retirement assets into an IRA to be managed by Keller Wealth Advisors, the firm charges for the management of those additional assets based on the tiered fee provided in response to Item 5 of this brochure. Because the way we make money creates some conflicts with client interests, Keller Wealth Advisors operates under a special rule. Under this special rule's provisions, we must: meet a professional standard of care when making investment recommendations (give prudent advice); never put our financial interests ahead of a client's when making recommendations (give loyal advice); avoid misleading statements about conflicts of interest, fees, and investments; follow policies and procedures designed to ensure that we give advice that is in client's best interest; charge no more than is reasonable for our services; and give clients basic information about the company's conflicts of interest.

Because of this fiduciary relationship, it is improper for Keller Wealth Advisors or its employees to use for their own benefit (or the benefit of anyone other than the client) information about the firm's trading or recommendations for client accounts; or take advantage of investment opportunities that would otherwise be available for the firm's clients.

Employees must at all times reflect the professional standards expected of those engaged in the investment advisory business and will act within federal, state and local laws and regulations pertaining to investment advisers and the general conduct of business. These standards require our staff to be judicious, accurate, objective and reasonable in dealing with both clients and other parties.

Keller Wealth Advisors' Code also includes an Insider Trading Policy that prohibits any Advisor and all Associated Persons from trading or recommending securities while in possession of non-public material information about the securities or its issuer.

A copy of the Code is provided to all Associated Persons annually. Also, annually, all Associated Persons are required to certify in writing his or her understanding and continuing acceptance of, as well as agreement to abide by, the guidelines and policies set forth in the Keller Wealth Advisors Code. Any material change or modification to the Code is distributed to all Associated Persons and they will be required to certify in writing their receipt, understanding and acceptance of the change(s).

Keller Wealth Advisors investment advisors and related persons may, on occasion, invest in the same securities that they also recommend to clients. Keller Wealth Advisors investment advisors may also, on occasion, recommend, or buy or sell securities for client accounts at or about the same time that the investment advisor buys or sells the same securities for his or her own account(s), or for the account(s) of related persons. These investment activities may inadvertently present a conflict of interest in the sense that it is remotely possible that Keller Wealth Advisors' personnel may benefit financially from a transaction for a client account.

All Associated Persons must conduct all personal securities transactions in full compliance with the Code and avoid serving their own personal interests ahead of the interests of the clients. In accordance with the code, the CCO reviews personal securities transactions on a quarterly basis to ensure continued compliance with the code. The firm believes it has addressed and mitigated this potential conflict of interest through its internal compliance policies and procedures, including the Code.

Brokerage Practices

Form ADV Part 2A, Item 12

Keller Wealth Advisors utilizes Trade-PMR, Inc. ("Trade-PMR") for brokerage and trade execution services. Trade-PMR clears trades and custodies assets with First Clearing, a FINRA member broker-dealer. First Clearing is a trade name used by Wells Fargo Clearing Services, LLC, a non-bank affiliate of Wells Fargo & Company. Trade-PMR acts as an introducing broker dealer on a fully disclosed basis. Trade-PMR and First Clearing are members of SIPC and are unaffiliated registered broker dealers and FINRA members. The brokerage commissions and/or transaction fees charged by Trade-PMR or any other designated broker-dealer are exclusive

of and in addition to Keller Wealth Advisors' fee. Keller Wealth Advisors regularly reviews these programs to seek to ensure that its recommendation is consistent with its fiduciary duty. Factors which Keller Wealth Advisors considers in recommending Trade-PMR and First Clearing or any other broker-dealer or custodian to clients include their respective financial strength, reputation, execution, pricing, research, and service. Keller Wealth Advisors also has other relationships with other financial services firms.

There is no direct link between Keller Wealth Advisors' utilization of Trade-PMR's institutional trading and custody services and the investment advice it gives to its clients, although Keller Wealth Advisors receives benefits through its participation in these brokerage services which are typically not available to retail investors. These brokerage services include the execution of securities transactions, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. Additionally, Keller Wealth Advisors receives the following benefits (provided without cost or at a discount) from Trade-PMR: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its participants; access to block trading which provides the ability to aggregate securities transactions and then allocates the appropriate shares to client accounts; access to mutual funds with no transaction fees; the ability to have advisory fees deducted directly from client accounts; and access to an electronic communication network for client order entry and account information. Some of the products and services made available by Trade-PMR may benefit Keller Wealth Advisors but may not benefit its client accounts. These products or services may assist Keller Wealth Advisors in managing and administering client accounts, including accounts not maintained at Trade-PMR. Other services made available by Trade-PMR are intended to help Keller Wealth Advisors manage and further develop its business enterprise. These benefits are generally included by all brokers-dealers that Keller Wealth Advisors would consider as part of their product offerings and institutional platforms. The benefits received by Keller Wealth Advisors or its personnel through the utilization of Trade-PMR's institutional trading and custody services do not depend on the amount of brokerage transactions directed to Trade-PMR. As part of its fiduciary duties to clients, Keller Wealth Advisors endeavors at all times to put the interests of its clients first. Keller Wealth Advisors feels that it has addressed this conflict because Keller Wealth Advisors' clients do not pay more for investment transactions effected and/or assets maintained at a particular broker-dealer or custodian as result of Keller Wealth Advisors' receipt of such benefit(s).

Keller Wealth Advisors investigates and analyzes products or services that reasonably address the client's needs. The products or services selected to implement the recommendation(s) must be in the client's financial best interest and consistent with the client's goals, needs and priorities. Transactions for the client are executed in a manner that the client's total cost or proceeds in each transaction is, in Keller Wealth Advisors' belief, the most qualitative under the circumstances or otherwise known as best execution. In keeping with Keller Wealth Advisors' best execution philosophy, broker commissions that may be paid by clients, the range of a broker's services such as execution capability, pricing and responsiveness are taken into consideration.

Keller Wealth Advisors generally considers a number of factors, such as, but not limited to, financial strength, reputation, execution, pricing, and service as criteria before recommending a broker-dealer. Keller Wealth Advisors generally recommends, but does not require, that clients utilize the brokerage services of Trade-PMR and clearing services of Wells Fargo Clearing Services, LLC. Clients of Keller Wealth Advisors are permitted, although not required, to instruct Keller Wealth Advisors to execute transactions through a specified broker-dealer. Not all firms require clients to direct brokerage.

Keller Wealth Advisors, on occasion, aggregates the purchase or sale of securities for various client accounts, if and/or when multiple clients are simultaneously recommended to buy or sell the same security on the same day. The determination to aggregate orders for client accounts will be made if Keller Wealth Advisors reasonably believes that aggregation will achieve most favorable execution and allow for the equitable allocation of differences in execution prices, commissions, or other transaction costs that might have been obtained had such orders been placed independently. In such event where a client directs Keller Wealth Advisors to use a particular broker-dealer, the client may pay higher brokerage commissions because the firm may not be able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices. If the client directs brokerage, the client will negotiate terms and arrangements for the account with that broker-dealer, and Keller Wealth Advisors will not seek better execution services or prices from other broker-dealers.

As a matter of general practice, Keller Wealth Advisors recommends mutual funds to clients with a need for equity securities exposure. Keller Wealth Advisors believes that mutual funds offer diversification and professional management to shareholders. When clients require fixed income securities to meet client needs, the firm will analyze and may recommend purchases of U.S. Treasury, Agency, Municipal and Corporate Bonds, Certificates of Deposit, Fixed Income Mutual Funds, and Fixed or Variable Annuities.

In transacting individual bonds, Keller Wealth Advisors will typically utilize the brokerage services of Oppenheimer & Co. Inc. (Oppenheimer), a broker-dealer registered with the U.S. Securities and Exchange Commission, and a member of FINRA/ SIPC. Keller Wealth Advisors will only affect bond trades through Oppenheimer in an effort to achieve better trade price execution. In bond trades effected by Oppenheimer, Oppenheimer will deliver securities or payment to a Depository Trust Company (DTC) account with instructions for the securities or payment to be delivered to the client's custodian, whom Keller Wealth Advisors provides with instructions as to the specific client account(s) the securities or payment should be placed in. The custodian produces trade confirmations for these transactions. DTC serves as the clearing house of the transaction and is a member of the U.S. Federal Reserve System and a registered clearing agency with the U.S. Securities and Exchange Commission. Neither Oppenheimer nor DTC are affiliated with Keller Wealth Advisors or its representatives. Keller Wealth Advisors does not receive compensation from Oppenheimer or DTC, nor are we under any obligation to use their services. Some custodians may charge "trade away" or "step-out" fees to clients for allowing a third party to effect trades in the account. Keller Wealth Advisors will only use the brokerage service of Oppenheimer if we determine in good faith that any additional trade away fees are reasonable in relation to the value obtained by placing the trade through Oppenheimer.

Upon review of a client's financial status, Keller Wealth Advisors may propose that the client include, as part of his or her financial portfolio, an insurance product. For the purpose of transacting in insurance products, Keller Wealth Advisors has a relationship with DPL Financial Partners, LLC ("DPL"). By working with DPL, Keller Wealth Advisors provides insurance reviews/analyses, education, and insurance solutions including commission free annuities, in a conflict free manner. Keller Wealth Advisors does not receive cash or non-cash compensation for any insurance products selected by the client, whether secured through DPL or any other agent. Clients are under no obligation to use DPL's service and may seek insurance advice from any licensed agent. DPL is a third-party provider of a platform of insurance products and consultancy services to SEC-registered investment advisers ("RIAs"). DPL offers RIAs memberships to its platform for a fixed annual fee and, through its licensed insurance agents who are also registered representatives of The Leaders Group, Inc. ("The Leaders Group"), an unaffiliated SEC-registered broker-dealer and FINRA member, offers members a variety of services relating to fee-based insurance products. These services include, among others, providing members with analyses of their current methodology for evaluating client insurance needs, educating and acting as a resource to members regarding insurance products generally and specific insurance products owned by their clients or that their clients are considering purchasing, and providing members access to and product marketing support regarding fee-based products that insurers have agreed to offer to members' clients through DPL's platform. For providing platform services to RIAs, DPL receives service fees from the insurers that offer their fee-based products through the platform. These service fees are based on the insurance premiums received by the insurers. DPL is licensed as an insurance producer in Kentucky and other jurisdictions where required to perform the platform services. Its representatives are also licensed as insurance producers, appointed as insurance agents of the insurers offering their products through the platform, and registered representatives of The Leaders Group. The insurance products and fee structures available from DPL may differ from those available from other third-party insurance agents. Keller Wealth Advisors recommends that clients fully evaluate products and fee structures prior to making an investment decision.

Review of Accounts

Form ADV Part 2A, Item 13

All client investment accounts will be continuously monitored by the portfolio managers of Keller Wealth Advisors. Account statements are received by Keller Wealth Advisors monthly from the custodian and are reconciled using a portfolio accounting service. Transactions in the portfolio will be reviewed for accuracy as they occur. Annual

reviews with the client are the suggested minimum, however depth and frequency of reviews vary by client. Client reviews consist of a “snapshot” of assets comparing current position to stated objectives, including asset allocation among various investment types. Market conditions, changes in an investor’s economic or life circumstance, or new academic research may initiate an adjustment to the client’s target allocation or rebalancing of the portfolio.

For each account, a portfolio manager and associate advisor will be responsible for client services. Every reviewer who performs client reviews is a CERTIFIED FINANCIAL PLANNER™ professional. Portfolio managers include the following individuals: Kyle W. Noack, Thomas Lane Keller, David B. Faskas, Beth Koonce, Sara Potts, Chris Laughhunn, Sarah Nix, and Hannah Gohmert.

Written portfolio reports are delivered to the clients quarterly, which contain a summary of assets held and a review of overall asset allocation.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

As noted in Item 12, Keller Wealth Advisors does receive economic benefits from Trade-PMR which includes electronic systems that assist in the management of Keller Wealth Advisors client accounts, access to research, the ability to directly debit client fees, software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), pricing information and other market data, assist with back-office functions, recordkeeping and client reporting. Such benefits are typically included by broker-dealers and are also listed in Item 12 of this brochure. There is no direct link between Keller Wealth Advisors’ utilization of Trade-PMR’s institutional trading and custody services and the investment advice it provides to its clients.

Keller Wealth Advisors provides cash compensation to promoters that are personnel for referring prospective clients to Keller Wealth Advisors (traditionally referred to as a solicitation arrangement). This compensation is paid as a small portion of a semi-annual bonus to those employees, and is calculated based on a predetermined business development metric. Section 206(4)-1 of the Advisers Act, otherwise known as the Marketing Rule, provides an exception from the disclosure requirements of the Rule under certain circumstances for promoters who are personnel or affiliates of the adviser. Keller Wealth Advisors has adopted policies and procedures with respect to cash compensation paid to promoters that are employees of Keller Wealth Advisors, and the applicable exception from disclosure requirements. Keller Wealth Advisors does not provide direct or in-direct cash or non-cash compensation to promoters outside of these limited circumstances.

Custody

Form ADV Part 2A, Item 15

Keller Wealth Advisors does not have physical custody of client funds and/or securities. However, Keller Wealth Advisors is deemed to have custody for two reasons: because the firm deducts clients’ advisory fees directly from the clients’ accounts and because the firm allows clients to execute standing letters of authorization (SLOA)s which provide Keller Wealth Advisors with limited authorization to initiate transfers to specified third party(ies).

Keller Wealth Advisors maintains client funds and securities with broker-dealers, banks and other “qualified custodians.” The qualified custodians send account statements at least quarterly directly to clients, which should be reviewed carefully by the client. Keller Wealth Advisors also sends account statements to their clients. Clients are urged to compare the account statement they receive from the qualified custodian with those statements they

receive from Keller Wealth Advisors. Comparing statements will allow the client to determine whether account transactions, including deductions to pay advisory fees, are accurate.

Investment Discretion

Form ADV Part 2A, Item 16

A client can engage Keller Wealth Advisors to provide investment advisory services on a discretionary basis, whereby the client will sign an agreement that gives Keller Wealth Advisors the authority to make trading decisions on the client's behalf without first having to seek the client's permission. This allows Keller Wealth Advisors to have discretionary authority over the following activities: the securities to be purchased or sold; the amount of securities to be purchased or sold; and when transactions are made. The advisor's decisions are based on what is suitable to the client's financial situation and consistent with the client's goals, needs and priorities. However, at any time, a client may impose restrictions in writing to limit or change this authority. Moreover, clients may grant Keller Wealth Advisors investment authority on a non-discretionary basis.

Voting Client Securities

Form ADV Part 2A, Item 17

Keller Wealth Advisors does not vote proxies on behalf of clients. Clients will receive proxy material directly from the custodian holding the client's account. It is solely the client's responsibility to vote his/her proxy(ies).

Clients may also receive solicitations relating to class action suits. It is Keller Wealth Advisors' policy that it will not provide advice or assist clients with respect to solicitations relating to such class action suits. It is solely the client's responsibility to make all elections relative to any mergers, acquisitions, tender offers, class action lawsuits, bankruptcy proceedings, or other type of events pertaining to the assets in his/her account(s).

Financial Information

Form ADV Part 2A, Item 18

Keller Wealth Advisors does not have any financial condition to disclose that is reasonably likely to impair the ability of the firm to meet contractual commitments to clients.