

**Item 1: Cover Page
Part 2A of Form ADV: Firm Brochure
January 6, 2021**

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**Firm Contact:
Mary Kathleen Norris
Chief Compliance Officer**

This brochure provides information about the qualifications and business practices of MKN Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us by telephone at 202-669-1960 or email kathleen@mknorris.org. 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 MKN Wealth Management LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Please note that the use of the term "registered investment adviser" and description of MKN Wealth Management, LLC and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Item 2: Material Changes

MKN Wealth Management, LLC (“MKN”, “the firm”) is required to advise you of any material changes to our Firm Brochure (“Brochure”) from the firm’s last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure.

Since the last annual amendment filed on 01/28/2020, we have the following material changes to disclose:

- We have removed references to third-party money movement as it was determined that we currently only have first-party movement.
- Our firm has updated Item 5 to display more accurate billing language pertaining to how fees are being charged.
- Our firm has removed Option Writing as an investment strategy since our firm does not sell or utilize options. Please see Item 8 for further information.
- Our firm has removed the DOL rule due to the rule no longer being in effect. Please see Item 11 for more details.

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Item 4: Advisory Business

A. Description of our advisory firm, including how long we have been in business and our principal owner(s).

MKN is dedicated to providing individuals and other types of clients with a wide array of investment advisory services. The firm is a limited liability company formed in the District of Columbia. The firm has been in business as an investment adviser since 2012 and is wholly owned by Mary Kathleen Norris.

B. Description of the Types of Advisory Services We Offer.

Asset Management:

MKN emphasizes continuous and regular account supervision. As part of the firm's asset management service, generally a portfolio is created; consisting of individual stocks or bonds, exchange traded funds ("ETFs"), options, mutual funds and other public and private securities or investments. The client's individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client's circumstances. Once the appropriate portfolio has been determined, MKN review's the portfolio at least quarterly and if necessary, rebalance the portfolio based upon the client's individual needs, stated goals and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

C. Explanation of whether (and, if so, how) we tailor our advisory services to the individual needs of clients, whether clients may impose restrictions on investing in certain securities or types of securities.

MKN offers individualized investment advice to clients utilizing asset management services. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account.

D. Participation in Wrap Fee Programs.

MKN does not offer wrap fee programs.

E. Disclosure of the amount of client assets managed on a discretionary and non-discretionary basis as of 12/31/2020.

MKN manages¹ \$25,024,000 on a discretionary basis and \$0 on a non-discretionary basis.

¹ Please note that our method for computing the amount of "client assets we manage" can be different from the method for computing "assets under management" required for Item 5.F in Part 1A of Form ADV. However, we have chosen to follow the method outlined for Item 5.F in Part 1A of Form ADV. If we decide to use a different method at a later date to compute "client assets we manage," we must keep documentation describing the method we use and inform you of the change. The amount of assets we manage may be disclosed by rounding to the nearest \$100,000. Our "as of" date must not be more than three months before the date we last updated our Brochure in response to Item 4.E of Form ADV Part 2A.

Item 5: Fees & Compensation

MKN is required to describe our brokerage, custody, fees, and fund expenses so you will know how much you are charged and by whom for our advisory services provided to you. MKN's fees are generally negotiable.

A. Description of how we are compensated for our advisory services provided to you.

Asset Management:

<u>Assets Under Management</u>	<u>Annual Percentage of Assets Charge</u>
\$0 to \$1,500,000	0.75%
Above \$1,500,000	0.50%

The firm's fees are billed on a pro-rata annualized basis quarterly in arrears based on the number of days in a calendar quarter (90,91,92) multiplied by the annual percentage of assets charged and then the value of your account on the last day of the previous quarter. For all accounts opened in the middle of the quarter, your account will only be billed on the number of days from opening the account to quarter-end. In other words, our formula for determining fees is: Number of Days in the Quarter divided by 365 days in a year multiplied with the annual fee and then multiplied with the value of your account on the last day of the quarter.

B. Description of whether we deduct fees from clients' assets or bill clients for fees incurred.

Asset Management:

Fees will generally be automatically deducted from your managed account*. Adjustments will be made for deposits and withdrawals during the quarter. As part of this process, you understand and acknowledge the following:

- a) Your independent custodian sends statements at least quarterly to you showing all disbursements for your account, including the amount of the advisory fees paid to MKN;
- b) You provide authorization permitting us to be directly paid by these terms;
- c) MKN sends a copy of our invoice to the independent custodian at the same time we send the invoice to you;
- d) MKN's invoice includes a legend that urges the client to compare information provided in their statements with those from the qualified custodian in account opening notices and subsequent statements sent to the client for whom the adviser opens custodial accounts with the qualified custodian.

*In rare cases, we will agree to directly bill clients.

C. Description of any other types of fees or expenses clients may pay in connection with our advisory services, such as custodian fees or mutual fund expenses.

Clients will pay the following separately incurred expenses, which MKN does not receive any part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses). Please see Item 12 of this Brochure for more information on our brokerage practices.

- D. We must disclose if client's advisory fees are due quarterly in advance. Explain how a client may obtain a refund of a pre-paid fee if the advisory contract is terminated before the end of the billing period. Explain how you will determine the amount of the refund.

MKN charges its advisory fees quarterly in arrears. If you wish to terminate the firm's services, you need to contact us in writing and state that you wish to cancel the advisory agreement. Upon receipt of your letter of termination, MKN will proceed to close out your account and charge you a pro-rata advisory fee(s) for services rendered up to the point of termination.

- E. Commissionable Securities Sales.

MKN does not sell securities for a commission. In order to sell securities for a commission, MKN would need to have our associated person registered with a broker-dealer. MKN has chosen not to do so.

Item 6: Performance-Based Fees & Side-By-Side Management

MKN does not charge performance fees to our clients.

Item 7: Types of Clients

MKN has the following types of clients:

- Individuals and High Net Worth Individuals;
- Trusts, Estates;
- Pension and Profit Sharing Plans; and
- Corporations, limited liability companies and/or other business types.

MKN's requirements for opening and maintaining accounts or otherwise engaging us:

- We require a minimum account balance of \$250,000 for our Asset Management service. This minimum account balance requirement is negotiable in certain circumstances and is generally required throughout the course of the client's relationship with our firm.

Item 8: Methods of Analysis, Investment Strategies & Risk of Loss

- A. Description of the methods of analysis and investment strategies we use in formulating investment advice or managing assets.

Methods of Analysis:

MKN uses the following methods of analysis in formulating our investment advice and/or managing client assets:

- **Charting:** In this type of technical analysis, MKN reviews charts of market and security activity in an attempt to identify when the market is moving up or down and to predict when how long the trend may last and when that trend might reverse.
- **Cyclical Analysis:** In this type of technical analysis, MKN measures the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.
- **Fundamental Analysis:** MKN attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.
- **Technical Analysis:** MKN analyzes past market movements and applies that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Investment Strategies MKN Uses:

MKN uses the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations. Typically MKN employs this strategy when we believe the securities to be currently undervalued, and/or we want exposure to a particular asset class over time, regardless of the current projection for this class.

- **Long-Term Purchases:** When utilizing this strategy, MKN may purchase securities with the idea of holding them for a relatively long time (typically held for at least a year). A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell. Typically MKN employs this sub-strategy when we believe the securities to be well valued; and/or we want exposure to a particular asset class over time, regardless of the current projection for this class.
- **Short-Term Purchases:** When utilizing this strategy, MKN may also purchase securities with the idea of selling them within a relatively short time (typically a year or less). MKN does this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase. Short-term investments require more decision-making and therefore more knowledge because of the frequent decisions necessary. Strategies such as Trading may result in higher transaction costs due to frequent trading carry no guarantees. Investors must be aware that it's possible to lose all of the principal you invest, and sometimes more.

- **Trading:** MKN purchases securities with the idea of selling them very quickly (typically within 30 days or less). MKN does this in an attempt to take advantage of our predictions of brief price swings. Trading has potential for immediate rewards, but it also involves risk because a stock may not recover from a downswing within a specific time frame—and may in fact drop further in price. In addition, frequent trading may result in higher transaction costs.
- **Risk of Loss:** Securities investments are not guaranteed and you may lose money on your investments. MKN asks that you work with us to help us understand your tolerance for risk.

Please Note:

Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

- B. Our practices regarding cash balances in client accounts, including whether we invest cash balances for temporary purposes and, if so, how.

MKN generally invests client’s cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, MKN tries to achieve the highest return on our client’s cash balances through relatively low-risk conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our services related to asset management service, as applicable.

Item 9: Disciplinary Information

MKN has determined that our firm and management do not have legal or disciplinary events to disclose that are material to the evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities & Affiliations

MKN has no other financial industry activities and affiliations to disclose.

Item 11: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

MKN recognizes that the personal investment transactions of employees of our firm demand the application of a Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, MKN believes that if investment goals are

similar for clients and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, MKN has in place a set of procedures with respect to transactions effected by the firm's members, officers and employees for their personal accounts². MKN maintains personal trading account records for employees.

An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. MKN has a fiduciary duty to all clients. MKN's fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. MKN requires our Ms. Norris to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, Ms. Norris will sign an acknowledgement that she has read, understood, and agrees to comply with our Code of Ethics. The firm and its employees must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect the duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of MKN's Code of Ethics. However, if a client or a potential client wishes to review the firm's Code of Ethics in its entirety, a copy will be provided promptly upon request.

Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. A conflict of interest arises in that our firm's related person may use their authority to buy and sell in client accounts to financially benefit their person accounts, commonly known as front-running. In order to minimize this conflict of interest, we have policies in place prohibiting related persons from buying or selling the same securities prior to buying or selling for our clients in the same day. If related persons' accounts are included in a block trade, our related persons will always trade personal accounts last. In addition, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request.

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Item 12: Brokerage Practices

- A. Description of the factors that our firm considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

² For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.

Custodian & Brokers Used

Our firm does not maintain custody of client assets (although our firm may be deemed to have custody of client assets if give the authority to withdraw assets from client accounts (see Item 15 Custody, below). Client assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. Our firm recommends that clients use Charles Schwab & Co., Inc. (“Schwab”), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian. Our firm is independently owned and operated, and not affiliated with Schwab. Schwab will hold client assets in a brokerage account and buy and sell securities when instructed. While our firm recommends that clients use Schwab as custodian/broker, clients will decide whether to do so and open an account with Schwab by entering into an account agreement directly with them. Our firm does not open the account. Even though the account is maintained at Schwab, our firm can still use other brokers to execute trades, as described in the next paragraph.

How Brokers/Custodians Are Selected

Our firm seeks to recommend a custodian/broker who will hold client assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. A wide range of factors are considered, including, but not limited to:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for client accounts)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- prior service to our firm and our other clients
- availability of other products and services that benefit our firm, as discussed below (see *“Products & Services Available from Schwab”*)

Custody and Brokerage Costs

Schwab generally does not charge a separate for custody services, but is compensated by charging commissions or other fees to clients on trades that are executed or that settle into the Schwab account. For some accounts, Schwab may charge your account a percentage of the dollar amount of assets in the account in lieu of commissions. Schwab’s commission rates and/or asset-based fees applicable to client accounts were negotiated based on our firm’s commitment to maintain a minimum threshold of assets statement equity in accounts at Schwab. This commitment benefits clients because the overall commission rates and/or asset-based fees paid are lower than they would be if our firm had not made the commitment. In addition to commissions or asset-based fees Schwab charges a flat dollar amount as a “prime broker” or “trade away” fee for each trade that our firm has executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into a Schwab account. These fees are in addition to the commissions or other compensation paid to the

executing broker-dealer. Because of this, in order to minimize client trading costs, our firm has Schwab execute most trades for the accounts.

1. Research and Other Soft Dollar Benefits. If we receive soft dollar research or other products or services other than execution from a broker-dealer or a third party in connection with client securities transactions (“soft dollar benefits”), we are required to disclose our practices and discuss the conflicts of interest they create. Please note that we must disclose all soft dollar benefits we receive, including, in the case of research, both proprietary research (created or developed by the broker-dealer) and research created or developed by a third party.

Products & Services Available from Schwab

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab’s business serving independent investment advisory firms like our firm. They provide our firm and clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help manage or administer our client accounts while others help manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (our firm does not have to request them) and at no charge as long as our firm keeps a total of at least \$10 million of client assets in accounts at Schwab. If our firm has less than \$10 million in client assets at Schwab, our firm may be charged quarterly service fees. Here is a more detailed description of Schwab’s support services:

Services that Benefit Clients

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which our firm might not otherwise have access or that would require a significantly higher minimum initial investment by firm clients. Schwab’s services described in this paragraph generally benefit clients and their accounts.

Services that May Not Directly Benefit Clients

Schwab also makes available other products and services that benefit our firm but may not directly benefit clients or their accounts. These products and services assist in managing and administering our client accounts. They include investment research, both Schwab’s and that of third parties. This research may be used to service all or some substantial number of client accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provides access to client account data (such as duplicate trade confirmations and account statements);
- facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- provides pricing and other market data;
- facilitates payment of our fees from our clients’ accounts; and
- assists with back-office functions, recordkeeping and client reporting.

Services that Generally Benefit Only Our Firm

Schwab also offers other services intended to help manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, Schwab will arrange for third-party vendors to provide the services to our firm. Schwab may also discount or waive fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide our firm with other benefits, such as occasional business entertainment for our personnel.

Irrespective of direct or indirect benefits to our client through Schwab, our firm strives to enhance the client experience, help clients reach their goals and put client interests before that of our firm or associated persons.

Our Interest in Schwab's Services.

The availability of these services from Schwab benefits our firm because our firm does not have to produce or purchase them. Our firm does not have to pay for Schwab's services so long as a total of at least \$10 million of client assets in accounts are kept at Schwab. Beyond that, these services are not contingent upon our firm committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may serve as an incentive to recommend that clients maintain their account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on the client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a potential conflict of interest. Our firm believes, however, that the selection of Schwab as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of Schwab's services (based on the factors discussed above – see "How Brokers/Custodians Are Selected") and not Schwab's services that benefit only our firm.

2. Brokerage for Client Referrals: If MKN uses client brokerage to compensate or otherwise reward brokers for client referrals, the firm must disclose this practice, the conflicts of interest it creates, and any procedures used to direct client brokerage to referring brokers during the last fiscal year (i.e., the system of controls used by us when allocating brokerage).

Our firm does not receive brokerage for client referrals.

3. Directed Brokerage.

MKN routinely recommends the use of Schwab. Each client will be required to establish their account(s) with Schwab if not already done. Please note that not all advisers have this requirement. In certain instances, clients may seek to limit or restrict our discretionary authority in making the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities

transactions are effected. Clients may seek to limit our authority in this area by directing that transactions (or some specified percentage of transactions) be executed through specified brokers in return for portfolio evaluation or other services deemed by the client to be of value. Any such client direction must be in writing (often through our advisory agreement), and may contain a representation from the client that the arrangement is permissible under its governing laws and documents, if this is relevant.

MKN provides appropriate disclosure in writing to clients who direct trades to particular brokers, that with respect to their directed trades, they will be treated as if they have retained the investment discretion that we otherwise would have in selecting brokers to effect transactions and in negotiating commissions and that such direction may adversely affect our ability to obtain best price and execution. In addition, we will inform you in writing that your trade orders may not be aggregated with other clients' orders and that direction of brokerage may hinder best execution.

MKN allows clients to direct brokerage. However, we may be unable to achieve the most favorable execution of client transactions. In addition, client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

Special Considerations for ERISA Clients

A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, MKN will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

- B. Discussion of whether, and under what conditions, we aggregate the purchase or sale of securities for various client accounts in quantities sufficient to obtain reduced transaction costs (known as bunching). If we do not bunch orders when we have the opportunity to do so, we are required to explain our practice and describe the costs to clients of not bunching.

MKN performs investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when MKN believes that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

Item 13: Review of Accounts

MKN review accounts on at least a quarterly basis for our clients subscribing to our Asset Management service. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Only Ms. Kathleen Norris will conduct reviews.

MKN may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

MKN may provide written reports to clients. Verbal reports to clients take place on at least an annual basis when MKN contacts clients who subscribe to the firm's Asset Management services. Verbal reports may include review of client's investment goals and/or objectives, updates on companies owned by clients, state of the markets, and proposed changes to client's portfolio.

Item 14: Client Referrals & Other Compensation

- A. If someone who is not a client provides an economic benefit to our firm for providing investment advice or other advisory services to our clients, we must generally describe the arrangement. For purposes of this Item, economic benefits include any sales awards or other prizes.

Our firm receives economic benefit from Schwab in the form of the support products and services made available to our firm and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit our firm, and the related conflicts of interest are described above (*see Item 12 - Brokerage Practices*). The availability of Schwab's products and services is not based on our firm giving particular investment advice, such as buying particular securities for our clients.

- B. If our firm or a related person directly or indirectly compensates any person who is not our employee for client referrals, we are required to describe the arrangement and the compensation.

MKN does not pay direct or indirect referral fees (non-commission based) to independent solicitors (non-registered representatives) or any person who is not a supervised person for the referral of their clients to our firm in accordance with relevant state statutes and rules.

Item 15: Custody

MKN does not have custody of client funds. State Securities Bureaus, or their equivalents, generally take the position that any arrangement under which a registered investment adviser is authorized or permitted to withdraw client funds or securities maintained with a custodian upon the adviser's instruction to the custodian is deemed to have custody of client funds and securities. As such, we have adopted the following safeguarding procedures:

- 1) MKN's clients must provide us with written authorization permitting direct payment to us of our advisory fees from their account(s) maintained by a custodian who is independent of the firm;
- 2) MKN must send a statement to its client's account custodian at the same time it sends an itemized invoice showing the amount of our fee, the value of your assets upon which MKN's fee was based, and the specific manner in which MKN's fee was calculated;
- 3) MKN must disclose to you that it is your responsibility to verify the accuracy of MKN's fee calculation, and that the custodian will not determine whether the fee is properly calculated; and
- 4) Your account custodian must agree to send you a statement, at least quarterly, showing all disbursements from your account, including advisory fees.

Item 16: Investment Discretion

MKN's clients need to sign a discretionary investment advisory agreement with the firm for the management of their account. This type of agreement only applies to our Asset Management clients. MKN does not take or exercise discretion with respect to our other clients, who may place reasonable restrictions on the types of investments to be held in the portfolio, as well as restrictions on what to purchase, sell, trade in stocks, bonds, mutual funds, and other securities.

Item 17: Voting Client Securities

MKN does not and will not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to MKN, the firm will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email MKN to discuss questions they may have about particular proxy votes or other solicitations.

Item 18: Financial Information

We are not required to provide financial information in this Brochure because:

- We do not require the prepayment of more than \$500 in fees and six or more months in advance.
- We do not take custody of client funds or securities.
- We do not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.

We have never been the subject of a bankruptcy proceeding.

Item 19: Requirements for State-Registered Advisers

- A. Identification of each of our principal executive officers and management persons, and description of their formal educations and business backgrounds.

M. Kathleen Norris

Born: 1960

Educational Background:

- 1982: Pennsylvania State University - BS in Marketing

Business Background:

- 03/2012 – Present MKN Wealth Management LLC; Managing Member & Chief Compliance Officer
- 10/2003 – 02/2012 Columbia Financial Advisors; Investment Adviser Representative
- 02/2004 – 12/2008 MAP Securities, Inc.; Registered Representative
- 05/2000 – 02/2002 UBS/Paine Webber; Registered Representative
- 10/1999 – 05/2000 First Union Securities, Inc; Financial Advisor
- 03/1997 – 10/1999 First Union Capital Markets Corp
- 03/1997 – 03/1999 Wheat First Securities, Inc
- 01/1986 – 02/1997 Merrill Lynch; Registered Representative

Exams, Licenses & Other Professional Designations:

- 1984: Series 7 Exam (Qualifying Broker-Dealer Examination)
- 1986: Series 63 Exam (Qualifying IAR Examination)
- 2003: Series 65 Exam (Qualifying IAR Examination)

- B. Description of any business in which we are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business.

MKN has nothing to disclose in this regard.

- C. In addition to the description of our fees in response to Item 5 of Part 2A, if our firm or a supervised person is compensated for advisory services with performance-based fees, we must explain how these fees will be calculated. Further, we must disclose specifically that performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

MKN does not charge performance-based fees.

- D. If our firm or a management person has been involved in one of the events listed below, we must disclose all material facts regarding the event.

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 statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

MKN has nothing to disclose in this regard.

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 statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

MKN has nothing to disclose in this regard.

E. In addition to any relationship or arrangement described in response to Item 10.C. of Part 2A, we must describe any relationship or arrangement that our firm or any of our management persons have with any issuer of securities that is not listed in Item 10.C. of Part 2A.

MKN has nothing to disclose in this regard.