The Von Dohlen Knuffke Financial Group, LLC

45 NE Loop 410, Suite 100 San Antonio, TX 78216 210-344-3221 www.tvdkfg.com January 15, 2015

This Brochure provides information about the qualifications and business practices of The Von Dohlen Knuffke Financial Group, LLC. If you have any questions about the contents of this Brochure, please contact us at 210-344-3221 or via email at admin@tvdkfg.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

The Von Dohlen Knuffke Financial Group, LLC ("TVDKFG") is a Registered Investment Advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information that you may use to determine whether to hire or retain them.

Additional information about TVDKFG is also available via the SEC's website <u>www.Advisorinfo.sec.gov</u>. You can search this site by using a unique identifying number, known as a CRD number. The CRD number for TVDKFG is 172094. The SEC's web site also provides information about any persons affiliated with TVDKFG who are registered, or are required to be registered, as Investment Advisor Representatives of TVDKFG.

Item 2 – Material Changes

This is a new Advisor.

This Brochure, dated January 15, 2015, is a new document that describes the Advisor's business.

In the future, this section of the Brochure will discuss only the specific material changes that were made to the Brochure and will provide our clients with a summary of all material changes that have occurred since the last filing of this Brochure. This section will also identify the date of our last annual Brochure update.

We will ensure that clients receive a summary of any material changes to this and subsequent Brochures within 90 days of the close of our business' fiscal year end which is December 31st. We will provide other ongoing disclosure information about material changes as they occur. We will also provide information on how to obtain the complete brochure. Currently, our Brochure may be requested at any time, without charge, by contacting Michael Knuffke at 210-344-3221.

Item 3 - Table of Contents

Table of Contents

| Item 2 – Material Changes | 2 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| Item 3 – Table of Contents | 3 |
| Item 4 – Advisory Business Introduction | 5 |
| Services | 5 |
| Financial Planning Financial Consulting | 5 |
| Asset Management | 6 |
| Third Party Money Managers | |
| Other Services | 10 |
| Assets Under Management | 10 |
| Item 5 – Fees and Compensation | 11 |
| Financial Planning Financial Consulting Fees | 11 |
| Asset Management Fee Schedule | 11 |
| Third Party Fees | 12 |
| Other Compensation | 12 |
| Item 6 – Performance Based Fee and Side by Side Management | 13 |
| Item 7 – Types of Client(s) | 14 |
| Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss | 14 |
| Morally Responsible (and Socially Responsible) Investing | 14 |
| Tactical Asset Allocation | 14 |
| Cyclical Analysis | 14 |
| Risks | 15 |
| Item 9 – Disciplinary Information | 18 |
| Item 10 – Other Financial Industry Activities and Affiliations | 19 |
| | |
| Insurance | |
| Insurance | |
| | 21 |
| Selection of Other Advisers | 21 21 |
| Selection of Other Advisers Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading | 21 21 21 |
| Selection of Other Advisers Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading General Information | 21 21 21 21 |
| Selection of Other Advisers Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading General Information Participation or Interest in Client Accounts | 21 21 21 21 21 22 |
| Selection of Other Advisers Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading General Information Participation or Interest in Client Accounts Personal Trading | 21 21 21 21 22 22 |

| Factors Used to Select Custodians and/or Broker-Dealers | 23 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| Soft Dollars | 23 |
| Best Execution | 24 |
| Directed Brokerage | 24 |
| Trading | 24 |
| Item 13 – Review of Accounts | 24 |
| Reviews | 24 |
| Reports | 25 |
| Item 14 – Client Referrals and Other Compensation | 25 |
| Item 15 – Custody | 25 |
| Item 16 – Investment Discretion | 25 |
| Item 17 – Voting Client Securities | 25 |
| Item 18 – Financial Information | 26 |
| Item 19 – Requirements for State Registered Advisors | 26 |
| ADV Part 2B Brochure Supplement – Patrick Von Dohlen | 77 |
| · | |
| Item 1 – Cover Page | |
| | 27 |
| Item 1 – Cover Page | 27 28 |
| Item 1 – Cover Page Item 2 – Educational Background and Business Experience | 27 28 28 |
| Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History | 27 28 28 28 28 |
| Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History Item 4 – Other Business Activities | 27 28 28 28 28 28 28 29 |
| Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History Item 4 – Other Business Activities Item 5 – Additional Compensation | 27 28 28 28 28 28 29 29 29 |
| Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History Item 4 – Other Business Activities Item 5 – Additional Compensation Item 6 – Supervision | 27 28 28 28 28 29 29 29 29 |
| Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History Item 4 – Other Business Activities Item 5 – Additional Compensation Item 6 – Supervision Item 7 – Requirements for State-Registered Advisors | 27 28 28 28 28 29 29 29 29 29 30 |
| Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History Item 4 – Other Business Activities Item 5 – Additional Compensation Item 6 – Supervision Item 7 – Requirements for State-Registered Advisors ADV Part 2B Brochure Supplement – Michael Raymond Knuffke | 27 28 28 28 28 29 29 29 29 29 30 30 |
| Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History Item 4 – Other Business Activities Item 5 – Additional Compensation Item 6 – Supervision Item 7 – Requirements for State-Registered Advisors ADV Part 2B Brochure Supplement – Michael Raymond Knuffke Item 1 – Cover Page | 27 28 28 28 28 29 29 29 29 30 30 31 |
| Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History Item 4 – Other Business Activities Item 5 – Additional Compensation Item 6 – Supervision Item 7 – Requirements for State-Registered Advisors ADV Part 2B Brochure Supplement – Michael Raymond Knuffke Item 1 – Cover Page Item 2 – Educational Background and Business Experience | 27 28 28 28 28 29 29 29 29 30 30 31 31 |
| Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History Item 4 – Other Business Activities Item 5 – Additional Compensation Item 6 – Supervision Item 7 – Requirements for State-Registered Advisors. ADV Part 2B Brochure Supplement – Michael Raymond Knuffke Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History | 27 28 28 28 29 29 29 29 29 30 30 31 31 31 31 |
| Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History Item 4 – Other Business Activities Item 5 – Additional Compensation Item 6 – Supervision Item 7 – Requirements for State-Registered Advisors ADV Part 2B Brochure Supplement – Michael Raymond Knuffke Item 1 – Cover Page Item 2 – Educational Background and Business Experience Item 3 – Disciplinary History Item 4 – Other Business Activities | 27 28 28 28 29 29 29 29 30 30 31 31 31 31 31 31 |

The Von Dohlen Knuffke Financial Group, LLC ("TVDKFG") is a Registered Investment Adviser ("Adviser") which offers investment advice, securities, insurance, and other financial services to clients.

We provide investment advice through Investment Advisor Representatives ("Advisor") associated with us. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on our behalf. In addition, all advisors are required to have a college degree, professional designation, and/or equivalent professional experience.

TVDKFG was founded in 2014 by Patrick Von Dohlen and Michael Knuffke, who serve as Managing Members. In addition, Michael Knuffke serves as the Chief Compliance Officer. We provide portfolio management services to high net worth physicians, land owners, trusts, estates, non-profit organizations, corporations, and small businesses. Our minimum account opening balance is \$100,000.00 which may be negotiable based upon certain circumstances.

Our mission is to improve the economic well-being and quality of life of each individual we touch by helping that person make smart choices based on what is most important to them so they can live a life on purpose. We specialize in helping high net worth physicians as well as business and land owners design and implement their Financial Road Map[®]. Their Financial Road Map[®] will help direct them toward their desired life and financial goals that require money and planning to achieve for the reasons important to them.

Services

We provide various comprehensive financial planning and consulting services, with an emphasis helping our clients delegate financial matters to us so they can focus on things that are not delegable and are more important than money to them. Our focus is on helping you accomplish their Financial Road Map[®].

Financial Planning | Financial Consulting

We provide services such as comprehensive financial consulting, financial planning, estate planning, business planning, and retirement planning. Fee based financial planning is a comprehensive relationship which incorporates many different aspects of our clients financial status into an overall plan that meets their goals and objectives. The financial planning relationship consists of face-to-face meetings and ad hoc communications with our client and/or their other advisors (attorneys, accountants, etc.) as necessary.

In performing financial planning services, we typically examine and analyze our clients' overall financial situation, which will include issues such as goal planning that require money and planning to achieve their target as well as liquidity, liability, growth, and/or protection planning. Our services may focus on all or only one of these areas depending upon the scope of our engagement with our client.

It is essential that clients provide the information and documentation we request regarding their income, investments, taxes, insurance, estate plan, and etc. We will discuss their investment objectives, needs and goals, but they are obligated to inform us of any changes. We do not verify any information obtained from a client, a client's attorney, accountant, or other professionals.

Based upon the client's needs, we may also provide consultations throughout the year to advice and counsel the client about other financial issues. We can help them with transition planning, major transaction analysis, coordinated with cash flow needs, retirement needs, estate planning needs, income tax planning, life and disability insurance needs, investment needs, and college education planning.

If a client engages us to perform these services, the client will receive a written agreement detailing the services, fees, terms, and conditions of the relationship. Clients will also receive this Brochure. Clients are under no obligation to implement recommendations through us. Clients may implement their financial plan through any financial organization of their choosing.

We obtain information from a wide variety of publicly available sources. We do not have any inside private information about any investments that are recommended. All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations. Choosing which advice to follow is the client's decision.

Asset Management

Asset management is the professional management of securities (stocks, bonds and other securities) and assets (e.g., real estate) in order to meet specified investment goals. With an Asset Management Account, the client engages us to assist them in developing a personalized asset allocation program and custom-tailored portfolio designed to meet their unique investment objectives. The investments in the portfolio account may include mutual funds, stocks, bonds, equity options, futures, etc.

Our asset management services for our clients includes, but is not limited to, helping them live life on purpose by completing and managing their Financial Road Map[®]. Their Financial Road Map[®] includes a thorough process of crystallizing and writing down what's important about money to them; identifying, naming, writing down and managing a minimum of three goals that require money and planning to accomplish; consolidate all of their current situation and quantify four categories of cash reserves, debt, growth and protection so they will know what they need to do and commit to accomplishing goals that are important to them.

Each time we meet with our clients, we have them review their Financial Road Map[®] and ask them if there is anything to add to it to continue to make their Financial Road Map[®] a "living", dynamic, consolidated document that has real significance and purpose to them. Additionally, we help them focus on not only their values and goals but also on the things that are more important than money to them and that bring happiness and joy to their lives. When we meet with them, we update and review their Action Plan to keep our meetings efficient, effective and show a history of their progress so they can see how far they have come and feel a sense of accomplishment

Planning issues will be identified for our clients based on their Financial Road Map[®] and by our clients choosing. We will help implement and manage those areas as they have delegated that task to us by virtue of our financial counseling mutually agreed to in the Consulting Services Agreement.

We will meet with our client(s) to discuss their financial circumstances, investment goals and objectives, and to determine risk tolerance. We will ask clients to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets

and liabilities, wills and trusts, insurance policies, and other pertinent information. We can also work with clients, in a consulting capacity, to create an Investment Policy Statement (IPS) that will serve as the roadmap to guide their wealth management program. A client's IPS will incorporate many different aspects of their financial status into an overall plan designed to meet stated goals and objectives. We will create a formal IPS and deliver it to our client upon completion.

Based on the information shared with us, we will analyze our client's situation and recommend an appropriate asset allocation or investment strategy. Each client will be provided with a targeted strategic allocation of assets by class, as well as limited investment advice. Our recommendations and ongoing management are based upon the client's investment goals and objectives, risk tolerance, and the investment portfolio they have selected. We will monitor the account, trade as necessary, and communicate regularly with clients. Each client's circumstances shall be monitored in annual account reviews and intermittently as needed by TVDKFG and our client. These reviews will be conducted in person, by telephone conference, and/or via a written inquiry/questionnaire. We will work with our clients on an ongoing basis to evaluate their asset allocation as well as rebalance their portfolio to keep it in line with their goals as necessary. We will be available to help our clients with questions about their Financial Road Map® and how their wealth management program is cooperating with it. Clients will also receive our Advisory Agreement which describes what services they will receive and what fees will be charged.

We will:

- Review our client's present financial situation
- Monitor and track assets under management
- Provide portfolio statements, periodic rate of return reports, asset allocation statement, rebalanced statements as needed
- Advise on asset selection
- Determine market divisions through asset allocation models
- Provide research and information on performance and fund management changes
- Crystallize what's important to our clients
- Complete a personalized Financial Road Map[®] (including our client's values & goals)
- Provide financial consulting and accountability coaching
- Help our clients to live a life on purpose
- Enhance our clients' quality of life through helping them to focus on what's more important than money
- Remove tasks from the client's "plate" so they can stay focused on what they need and want to do

- Make smart choices for the greatest possibility of achieving our clients' goals
- Complete feasibility and due diligence to achieve Greater Probable Solution[™] (GPS)
- Provide independent, objective advice with over 54 years of in-house experience
- Orchestrate advanced planning using a team of subject matter specialists with over 150 years of experience
- Deduce, discern and execute prudent decisions to implement solutions
- Implement smart choices
- Carry out steps to accomplish the client's Financial Road Map[®]
- Engage our subject matter specialists and technicians
- Utilize and mobilize our vast professional relationships to accomplish the client's goals
- Initiate and manage deliverables
- Complete and maintain Financial Road Map[®], Quality of Life Enhancer and create and administer an Action Plan to include a time line for addressing personal & business planning in the areas of:
 - Assets, Business(es), Capital Expenditures, Cash Reserves, Estate, Finance, Financial Position, Liquidity, Real Estate, Re-finance, Retirement, Practice, Investments, Income, Liabilities, Personal Time, Protection, Recreation, Vocation and Vacation
- Simplify the client's life
- Maintain a copy of records, accounts and documents for reliable access
- Allow access to our firm's resources year-round
- Conduct implementation and progress meetings to keep our clients on track
- Respond to unanticipated money and planning issues at the client's choosing

Clients shall notify us promptly when their financial situation, goals, objectives, or needs change.

Clients shall have the ability to impose reasonable restrictions on the management of their account(s), including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction requested, including but not limited to morally responsible investing.

Under certain conditions, securities from outside accounts may be transferred into the client's advisory account; however, we may recommend that the client sell any security if we believe that it is not suitable for the current recommended investment strategy. Clients are responsible for any taxable events in these instances. Certain assumptions may be made with respect to interest and inflation rates and the use of

past trends and performance of the market and economy. Past performance is not indicative of future results.

If a client decides to implement our recommendations, we will help the client open a custodial account(s). The funds in the client's account will generally be held in a separate account, in the client's name, at the Custodian, and not with us.

Clients will enter into a separate custodial agreement with the custodian. This agreement, among other things, authorizes the custodian to take instructions from us regarding all investment decisions for the client's account. We will select the securities bought and sold and the amount to be bought and sold, within the parameters of the objectives and risk tolerance of the client's account. The custodian will effect transactions, deliver securities, make payments and do what we instruct. Clients are notified of any purchases or sales through trade confirmations and monthly statements that are provided by the custodian. These statements list the total value at the start of the quarter, itemize all transaction activity during the quarter, and list the types, amounts, and total value of securities held as of the end of the quarter. The statement may be in either printed or electronic form based upon client preferences. Clients will at all times maintain full and complete ownership rights to all assets held in their account(s), including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

The Custodian will also provide clients with a quarterly performance statement starting at the end of the first full calendar quarter after signing the Client Advisory Agreement. These statements give clients additional feedback regarding performance, educate them about their long-term investment philosophy, and describe any changes in current strategy and allocation along with the reasons for making these changes.

We manage assets on both a discretionary and non-discretionary basis. Discretionary authority means that our clients have given us the authority to determine the following with/without their consent:

- Securities to be bought or sold for their accounts
- Amount of securities to be bought or sold for their accounts
- Broker-dealer to be used for a purchase or sale of securities for their accounts
- Commission rates to be paid to a broker or dealer for their securities transaction.

If our clients have not given us the authority to manage their account on a discretionary basis, then we cannot trade in that account without their express permission.

Trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position. Additionally, a client's account may be rebalanced or reallocated periodically in order to reestablish the targeted percentages of our client's initial asset allocation. This rebalancing or reallocation will occur on the schedule we have determined together. The client(s) will be responsible for any and all tax consequences resulting from any rebalancing or reallocation of the account. We are not tax professionals and do not give tax advice. However, we will work with our clients' tax professionals to assist them with

tax planning. They will have the opportunity to meet with us periodically to review the assets in the client's account.

We are available during normal business hours either by telephone, fax, email, or in person by appointment to answer any questions.

Third Party Money Managers

We may determine that opening an account with a professional third party money manager is in our clients' best interests. We have contracts with several third party money managers.

These programs allow clients to obtain portfolio management services that typically require higher minimum account sizes outside of the program. The money managers selected under these programs will have discretion to determine the securities they buy and sell within the account, subject to reasonable restrictions imposed by the client. Due to the nature of these programs, each of the independent money managers is obligated to provide the client with a separate disclosure document. Clients should carefully review this document for important and specific program details, including pricing.

Under these programs, we may:

- Assist in the identification of investment objectives
- Recommend specific investment style and asset allocation strategies
- Assist in the selection of appropriate money managers and review performance and progress
- Recommend reallocation among managers or styles within the program
- Recommend the hiring and firing of money managers utilized by our clients.

Clients should read the ADV Part 2 disclosure document of the money manager selected for complete details on the charges and fees they will incur.

Other Services

If a client does not have enough assets to make it feasible to set up a managed account with us, we can provide assistance with establishing brokerage accounts and making initial investments based on their suitability requirements. We will provide a level of portfolio monitoring and may trade periodically to rebalance the client's portfolios. In addition, we will receive, review, and store duplicate brokerage account statements for the client. This level of service requires an annual retainer fee.

We also offer fixed-fee project-based services including portfolio reviews and investment policy statements.

Assets Under Management

As of November 2014, we do not have any asset under management nor do we have accounts for which we provide asset management services. We are a new Advisor in 2014.

We do not participate in or sponsor wrap fee programs.

Item 5 – Fees and Compensation

We provide asset management and financial planning services for a fee. Our Advisory Agreement/Financial Planning Agreement defines what fees are charged and their frequency.

Financial Planning | Financial Consulting Fees

TVDKFG can provide a comprehensive financial plan for a fixed minimum fee of \$10,000 up to \$100,000. Consulting services without a financial plan or analysis are available for a fee ranging from a minimum of \$5,000.00 up to \$100,000. All fees are negotiable.

The Financial Planning |Financial Consulting Agreement will show the fee the client will pay. The fee is due at the time the agreement is signed and payable via check or credit card. Financial plans will be presented to the client within 180 days of the contract date, provided that all information needed to prepare the financial plan has been promptly provided to us. We do not accept prepayment of more than \$500 in fees per client, six months or more in advance. The financial planning agreement will terminate once the client receives the final plan.

Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge.

All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations.

Asset Management Fee Schedule

Our minimum account opening balance is \$100,000.00 which may be negotiable based upon certain circumstances. The fee charged is based upon the amount of money invested. Multiple accounts of immediately-related family members, at the same mailing address, may be considered one consolidated account for billing purposes. Fees are charged quarterly, in advance. Payments are due and will be assessed on the last business day of each quarter, based on the ending balance of the account under management for the preceding quarter and will be calculated as follows:

| Percentage | Portfolio Size (AUM) |
|------------|-------------------------|
| 0.98% | \$0-\$500,000 |
| 0.90% | \$500,001-\$1,000,000 |
| 0.75% | \$1,000,001-\$2,000,000 |
| Negotiable | \$2,000,001+ |

No increase in the annual fee shall be effective without prior written notification to the client. We believe our advisory fee is reasonable considering the fees charged by other investment advisors offering similar services/programs. In certain circumstances, advisory fees and account minimums may be negotiable based upon prior relationships as well as related account holdings. Clients may also pay additional advisory fees to a third party money manager depending upon which manager they select.

Clients' accounts at the custodian may also be charged for certain additional assets managed for clients by us but not held by the custodian (i.e. variable annuities, mutual funds, 401(k) s).

The fees we charge can be deducted directly from the client's account at the custodian. We will instruct the custodian to deduct the fees from the client account at the end of the preceding quarter. This fee will show up as a deduction on the following quarterly account statement from the custodian.

The Advisory Agreement shall remain in effect for one year unless terminated in writing by either party with a thirty (30) day written notice. Upon termination of any agreement, any prepaid fees that are in excess of the management services performed will be promptly refunded to the client via check or credit card at the beginning of the calendar or agreement quarter. Any fees that are due, but have not been paid, will be billed to the client and are due immediately unless they request to make payment at the beginning of the calendar or agreement quarter as had been set forth upon the signing of our agreement. Credit Card payments may include an additional fee to pay for merchant account fees.

Third Party Fees

Certain strategies offered by us involve investment in mutual funds. Load and no load mutual funds may pay annual distribution charges, which are sometimes referred to as "12(b) (1) fees". These 12(b) (1) fees come from fund assets, and thus indirectly from clients' assets. We do not receive any compensation from these fees. The 12(b) (1) fee, deferred sales charges, and other fee arrangements will be disclosed upon the client's request and are typically described in the applicable fund's prospectus.

Our fees do not include brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by custodians, third party investment companies and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds, money market funds and exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. We do not receive any compensation from these fees. All of these fees are in addition to the management fee clients pay us. Clients should review all fees charged to fully understand the total amount of fees they will pay.

Clients could invest in a mutual fund directly, without our services. In that case, they would not receive the services provided by us which are designed, among other things, to assist them in determining which mutual fund or funds are most appropriate to their financial condition and objectives.

Other Compensation

As part of our asset management and financial planning/consulting services, we may recommend and sell life, disability, health, and long-term care insurance. We will receive the usual and customary

commissions associated with these sales from the insurance company. Clients will not pay a separate fee for these and their advisory fee will not be reduced by any payments we receive from these sales.

If the client implements our recommendations through us, we may receive compensation from the sale of insurance products or advisory services recommended from the respective financial institution. This compensation would be in addition to the asset management fee and financial planning/consulting fee the client pays. The fees and expenses the client pays for the purchase of these products may be more or less than the expenses they would pay should they decide to implement our recommendations through another investment advisory firm or broker-dealer and are typically determined by the broker-dealer or investment company sponsoring the product. Therefore, a conflict of interest may exist between our interests and the client's interests since we may recommend products that pay us a commission. We may have an incentive to recommend particular products based upon potential compensation rather than the client's needs. This potential conflict is addressed in our Code of Ethics.

We may also make recommendations regarding mortgages and investment research that are not related to the management client accounts. We will receive the usual and customary commissions associated with these sales from the respective financial institution. Clients will not pay a separate management fee for these and their advisory fee will not be reduced by any payments we receive from these sales.

Item 6 - Performance Based Fee and Side by Side Management

In addition to the fees described in "Item 5 – Fees and Compensation," all advanced level asset management accounts will be charged a performance-based fee (fee based on a share of capital gains, or capital appreciation of, the assets of a client). This level of service is only available to clients that are "qualified clients" as defined by SEC Rule 205-3. The definition includes either the client has at least \$1 million under management with us immediately after entering into the advisory contract or the client has more than \$2 million in net worth at the time the contract is entered into (excluding the value of a client's primary residence). In addition, the Advisor requires the client to have been with the Advisor for more than one year.

The performance fee is 25% of the profits in the account above a 5% annualized rate of return minus all prior losses calculated on a calendar-year basis. In calculating the performance-based fees, we include both realized and unrealized capital gains and losses.

Such fees are subject to individualized negotiation with each such client. We will structure any performance or incentive fee arrangement subject to the rules in accordance with the available exemptions, including the exemption set forth in the rules. In measuring clients' assets for the calculation of performance-based fees, we shall include realized and unrealized capital gains and losses.

We will manage assets for both accounts that are charged a performance based fee and accounts that charged asset-based fees. Such fee arrangements create a conflict of interest in that there is an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. We have procedures designed and implemented to ensure that all clients are treated fairly and equally, and

to prevent this conflict from influencing the allocation of investment opportunities among clients. Performance based fee arrangements may create an incentive for us to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. In all instances, we will always put the client's interest ahead of our own.

Item 7 - Types of Client(s)

We provide portfolio management services to high net worth individuals, trusts, estates, non-profit organizations, corporations, and small businesses.

Our minimum account opening balance is \$100,000.00 which may be negotiable based upon certain circumstances.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

We offer morally responsible investing and tactical asset allocation as part of our overall investment management discipline; the implementation of these analyses as part of our investment advisory services to our clients may include any, all or a combination of the following:

Morally Responsible (and Socially Responsible) Investing

We use Morally Responsible Investing to select investments for our clients' accounts. In our opinion, investing requires a rational, objective, orderly, and business-like approach, which balances initiative, prudence and maintenance over an extended period of time to yield positive results. With the availability of thousands of investment options, clients should be able to invest in a manner consistent with their personal beliefs. There are fund offerings covering most major assets classes: equities, fixed income and balanced portfolios, as wells as domestic and international securities and companies of all market caps. Investment managers in this genre may employ value, growth or a blended style of management. A morally responsible investment should complement other investments available

Tactical Asset Allocation

Tactical Asset Allocation is an active management portfolio strategy that rebalances the percentage of assets held in various categories in order to take advantage of market pricing anomalies or strong market sectors. Tactical asset allocation allows for a range of percentages in each asset class (such as stocks = 40-50%). These are minimum and maximum acceptable percentages that permit the Advisor to take advantage of market conditions within these parameters. A minor form of market timing is possible, since the Advisor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

Cyclical Analysis

While we do not attempt to time the market, we may use cyclical analysis in conjunction with other strategies to help determine if shifts are required in clients' investment strategies depending upon long

and short-term trends in financial markets and the performance of the overall national and global economy.

Risks

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that clients should be prepared to bear. Clients need to understand that investment decisions made for their accounts by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for them will not always be profitable nor can we guarantee any level of performance.

A list of all risks associated with the strategies, products and methodology we offer are listed below:

1. Alternative Investment Risk

Investing in alternative investments is speculative, not suitable for all clients, and intended for experienced and sophisticated investors who are willing to bear the high economic risks of the investment, which can include:

- Loss of all or a substantial portion of the investment due to leveraging, short-selling or other speculative investment practices
- Lack of liquidity in that there may be no secondary market for the fund and none expected to develop
- Volatility of returns
- Absence of information regarding valuations and pricing
- Delays in tax reporting
- Less regulation and higher fees than mutual funds.
- 2. Bond Fund Risk

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields of the risks associated with bond funds include:

- Call Risk The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- Credit Risk the possibility that companies or other issuers whose bonds are owned by the fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.
- Interest Rate Risk the risk that the market value of the bonds will go down when interest rates go up. Because of this, clients can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
- Prepayment Risk the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that

pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

3. Morally Responsible (and Socially Responsible) Investing Risk

Morally Responsible Investing, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political and social factors, in addition to the various company statistics.
- The potential opportunity lost by not being able to invest in companies that violate a moral screen.
- The data used may be out of date.
- It is difficult to give appropriate weightings to the factors.
- It ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.
- 4. Tactical Asset Allocation

Tactical Asset Allocation, carries a number of risks:

- At times, judgments as to the asset classes in which the portfolio should invest may prove to be wrong, as some asset classes may perform worse than other or the equity markets generally from time to time or for extended periods of time.
- The value of securities in the portfolio may decline due to daily fluctuations in the securities markets, including fluctuation in interest rates, national and international economic conditions and general equity market conditions.
- To the extent the portfolio focuses on a particular style of stocks, such as growth or value, its performance may at times be better or worse than that of similar portfolios with other focuses or that have a broader investment style.
- From time to time, a particular set of circumstances may affect a particular industry or certain companies within an industry, while having little or no impact on other industries or other companies within the industry.
- There is a possible risk influence of random events such as oil spills, product defects being exposed, and acts of God and so on.
- 5. Insurance Product Risk

The rate of return on variable insurance products is not stable, but varies with the stock, bond and money market subaccounts that clients choose as investment options. There is no guarantee that clients will earn any return on their investment and there is a risk that they will lose money. Before considering purchasing a variable product, clients should make sure they fully understand all of its terms. Carefully read the prospectus. Some of the major risks include:

- Liquidity and Early Withdrawal Risk There may be a surrender charges for withdrawals within a specified period, which can be as long as six to eight years. Any withdrawals before a client reaches the age of 59 ½ are generally subject to a 10 percent income tax penalty in addition to any gain being taxed as ordinary income.
- Sales and Surrender Charges Asset-based sales charges or surrender charges. These charges normally decline and eventually are eliminated the longer the client holds their shares. For example, a surrender charge could start at 7 percent in the first year and decline by 1 percent per year until it reaches zero.
- Fees and Expenses There are a variety of fees and expenses which can reach 2% and more such as:
 - Mortality and expense risk charges
 - Administrative fees
 - Underlying fund expenses
 - Charges for any special features or riders.
- Bonus Credits Some products offer bonus credits that can add a specified percentage to the amount invested ranging from 1 percent to 5 percent for each premium payment. Bonus credits, however, are usually not free. In order to fund them, insurance companies typically impose high mortality and expense charges and lengthy surrender charge periods.
- Guarantees Insurance companies provide a number of specific guarantees. For example, they may guarantee a death benefit or an annuity that can provide income for life. These guarantees are only as good as the insurance company that gives them.
- Market Risk The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- Principal Risk The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

6. Mutual Funds Risk

The following is a list of some general risks associated with investing in mutual funds.

- Country Risk The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- Currency Risk -The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- Income Risk The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- Industry Risk The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.

- Inflation Risk The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- Manager Risk -The possibility that an actively managed mutual fund's investment Advisor will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- Market Risk -The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- Principal Risk -The possibility that an investment will go down in value, or "lose money," from the original or invested amount.
- 7. Overall Risks
 - Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. Clients may lose some or all of the money they invest, including their principal, because the securities held by a fund goes up and down in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.
 - Before investing, clients should be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond the client's comfort level and are inconsistent with the client's financial goals.
 - While past performance does not necessarily predict future returns, it can tell clients how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If clients will need their money to meet a financial goal in the near-term, they probably can't afford the risk of investing in a fund with a volatile history because they will not have enough time to ride out any declines in the stock market.
- 8. Stock Fund Risk

Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

Item 9 – Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of us or the integrity of our management. We do not have any information to disclose concerning TVDKFG or any of our investment Advisors. We adhere to high ethical standards for all Advisors and associates. We strive to do what is in the clients' best interests.

The investment adviser representatives of TVDKFG have the following outside business activities and/or affiliations to disclose.

Insurance

Patrick Von Dohlen and Michael Knuffke, the Managing Members for TVDKFG, are licensed insurance agents/brokers with various companies. The sale of these products accounts for approximately 10% of their time.

Patrick Von Dohlen and Michael Knuffke may recommend insurance products and may also, as independent insurance agents, sell those recommended insurance products to Clients. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed Investment Adviser Representatives earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all Investment Adviser Representatives disclose this conflict of interest when such recommendations are made. Also, we require Investment Adviser Representatives to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

Patrick Von Dohlen shares a 50% ownership in The Von Dohlen Knuffke Financial Group, Inc., which offers business management planning and consulting. This role accounts for approximately 15% of his time.

Under Von Dohlen Consulting GP, LLC, Patrick Von Dohlen shares 50% ownership in the Limited Partnership of a Nursing Home. This activity accounts for approximately 5% of his time.

Patrick Von Dohlen and Michael Knuffke have made various investments in companies for which they serve as managers, principals, members, or board members. Most of Patrick Von Dohlen and Michael Knuffke's outside business activities are non-investment related and require them to maintain books and records, supervise staff, and attend board meetings as necessary.

Other outside business for Patrick Von Dohlen:

| Activity Description | Position Held | Hours per Month | Compensation |
|----------------------------------------------|---------------------|--------------------|--------------|
| The Von Dohlen Knuffke Financial Group, LLC | Managing Member | Unknown | New Unknown |
| The Von Dohlen Knuffke Financial Group, Inc. | Principal | Forty | \$6,000 |
| Von Dohlen Consulting GP, LLC | Principal Partner | One | \$7,000 |
| TDVD, Ltd. | Limited Partner | Two | \$10,000 |
| MFG, Ltd. | Limited Partner | Two | \$2,000 |
| Association of Former Students | Member | Three | None |
| Aggie Area Representative | | | |
| Conquest Boys Club of San Antonio | Leader/Helper | Four | None |

| St. Mark the Evangelist Catholic Parish church | Lector | Two | None |
|------------------------------------------------|--------------|----------|------|
| Columbian Squires | Counselor | Four | None |
| Knights of Columbus Council 7613 | Member | One | None |
| Responsible Government Coalition | Member | Four | None |
| Salt and Light Transformation (SALT) | Member | One | None |
| Alamo Torch | Member | One | None |
| Let The People Vote | Board Member | One | None |
| Streetcar Vote Coalition | Board Member | Six | None |
| Mission Sonogram | Board Member | One | None |
| Saint Anthony Family Association | Board Member | One | None |
| San Antonio Family Association | Board Member | Thirteen | None |
| Friends of SAFA Texas | Board Member | Three | None |
| The Gates Way | Board Member | Four | None |
| Texas Leadership Coalition | Board Member | Five | None |
| Texas Leadership Institute for Public Advocacy | Board Member | Four | None |
| More Statesmen | Board Member | Two | None |

Other outside business for Michael Knuffke:

| Activity Description | Position Held | Hours per Month | Compensation |
|--------------------------------------|---------------|-----------------|--------------|
| Regnum Christi San Antonio | Board Member | Тwo | None |
| Allied Women's Center | Board Member | Four | None |
| A Choice for Women's Center | Board Member | Half an hour | None |
| Mission Sonogram | Board Member | Half an hour | None |
| Michael R. Knuffke and Associates | Principal | Three | \$500.00 |
| Michael Knuffke Insurance Agent | Proprietor | Three | \$3,000.00 |
| Conquest Boys Club of San Antonio | Leader/Helper | Four | None |
| Columbian Squires | Helper | Four | None |
| San Antonio Family Association | Board Member | 15 | None |
| Friends of SAFA Texas | Board Member | Four | None |
| Responsible Government Coalition | Member | Four | None |
| Salt and Light Transformation (SALT) | Member | Four | None |
| Alamo Torch | Board Member | Four | None |

| The Gates Way | Board Member | Four | None |
|----------------------------------|---------------------|----------|-------------|
| The Von Dohlen Knuffke Financial | Managing | Unknown | New Unknown |
| Group, LLC | Member | | |
| The Von Dohlen Knuffke Financial | Principal | Forty | \$6,000 |
| Group, Inc. | | | |
| The Von Dohlen Knuffke Group, GP | Principal Partner | One | \$7,000 |
| Knights of Columbus Council 7613 | Member | One | None |
| Streetcar Vote Coalition | Board Member | Six | None |
| Saint Anthony Family Association | Board Member | One | None |
| San Antonio Family Association | Board Member | Thirteen | None |
| Friends of SAFA Texas | Board Member | Three | None |
| The Gates Way | Board Member | Four | None |
| More Statesmen | Board Member | Тwo | None |

Selection of Other Advisers

As part of our service, we may recommend Third Party Managers to clients and may be compensated by the Third Party Manager[s] from the advisory fees collected from the client. This will create a conflict of interest since we may receive compensation for referring clients to these vendors. In order to mitigate this conflict of interest, we require all Advisors to inform the client that they are under no obligation to implement any recommendations made by the Advisor or us.

Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading

General Information

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to our clients, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

Participation or Interest in Client Accounts

Our Compliance policies and procedures prohibit anyone associated with TVDKFG from having an interest in a client account or participating in the profits of a client's account without the approval of the CCO.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting TVDKFG.

Personal Trading

We may recommend securities to clients that we will purchase for our own accounts. We may trade securities in our account that we have recommended to clients as long as we place our orders after their orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

We have established the following restrictions in order to ensure our fiduciary responsibilities to our clients are met:

 No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of Investment Advisory Representative(s) of TVDKFG, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of our clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Privacy Statement

We are committed to safeguarding our clients' confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from clients or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of client information. Our Privacy Policy is available upon request.

Conflicts of Interest

TVDKFG's advisors may employ the same strategy for their personal investment accounts as it does for its clients. However, advisors may not place their orders in a way to benefit from the purchase or sale of a security.

We act in a fiduciary capacity. If a conflict of interest arises between us and clients, we shall make every effort to resolve the conflict in client's favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

Item 12 – Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

We recommended that clients establish accounts with our designated custodian, as the qualified custodian when utilizing our asset management services. We believe our designated custodian offers competitive execution and provide low cost transactions to individuals.

Soft Dollars

Soft dollar benefits may be proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

The Custodian we use may provide us with certain brokerage and research products and services that qualify as "brokerage or research services" under the rules. These research products and/or services will assist the Advisor in its investment decision making process. Such research generally will be used to service all of the Advisor's clients, but brokerage commissions paid by the client may be used to pay for research that is not used in managing the client's account. The account may pay to a broker-dealer a commission greater than another qualified broker-dealer might charge to effect the same transaction where the Advisor determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received.

Because soft dollar benefits could be considered to provide a benefit to the Advisor that might cause the client to pay more than the lowest available commission without receiving the most benefit, they are considered a conflict of interest in recommending or directing custodial and third party managerial services. TVDKFG mitigates these conflicts of interest through strong oversight of soft-dollar arrangements by the Chief Compliance Officer, in order to assure the soft dollar benefits serve the best interests of the client.

There may other benefits from recommending Custodians such as software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Other services may include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom TVDKFG may

contract directly. TVDKFG may receive seminar expense reimbursements from product sponsors which may be based on the sales of products to their clients.

Best Execution

We have an obligation to seek best execution for our clients. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, reputation and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

Directed Brokerage

We require clients to use our designated custodian. We do not permit clients to direct brokerage another broker-dealer or custodian.

Trading

Transactions for each client account generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or "batch" such Orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

Transactions placed in an asset management account by a third party manager will be executed through their broker-dealer or custodian. In determining best execution for these transactions, the third party manager is looking at whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. While they look for competitive commission rates, they may not obtain the lowest possible commission rates for account transactions. The aggregation and allocation practices of mutual funds and third party managers that we recommend to clients are disclosed in the respective mutual fund prospectuses and third party manager disclosure documents which will be provided to clients.

Item 13 - Review of Accounts

Reviews

Reviews are conducted at least annually or as agreed to by us. Reviews will be conducted by our Chief Compliance Officer and Managing Member, Michael Knuffke. Clients may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a mutual fund or company in which client assets are invested, and market shifts and corrections. We do not provide any other statements except the ones provided by the custodian.

Item 14 - Client Referrals and Other Compensation

We do not receive any compensation for referring clients to another advisor nor do we pay any compensation to another advisor if they refer clients to us.

Item 15 – Custody

We do not have physical custody of any accounts or assets. However, we may be deemed to have custody of clients' account(s) if we have the ability to deduct their quarterly fees from the custodian. We use our designated custodian and/or broker-dealer for all client accounts. Clients should receive at least quarterly statements from the broker-dealer or custodian that holds and maintains their investment assets. We urge clients to carefully review such statements and compare this official custodial record to the account statements that we may provide. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If clients notice any discrepancies, please contact TVDKFG.

Item 16 – Investment Discretion

We usually receive discretionary authority from clients at the beginning of an advisory relationship to select the identity and amount of securities to be bought or sold. This information is described in the Advisory Agreement our clients sign with us. In all cases, however, this discretion is exercised in a manner consistent with clients' stated investment objectives for their accounts.

When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions clients have set. For registered investment companies, our authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

We require that any investment guidelines and/or restrictions be provided to us in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in their portfolios. We may provide advice to our clients regarding clients' voting of

proxies. We are authorized to instruct the custodian to forward clients' copies of all proxies and shareholder communications relating to their account assets.

Item 18 – Financial Information

We are required to provide clients with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to our clients. We have not been the subject of any bankruptcy proceedings. In no event shall we charge advisory fees that are both in excess of five hundred dollars and more than six months in advance of advisory services rendered.

Item 19 - Requirements for State Registered Advisors

Part A

Please refer to the Part 2B attached.

Part B

Please refer to the Part 2B attached.

Part C

Please refer to the Part 2B attached.

Part D

Please refer to the Part 2B attached.

Part E

Please refer to the Part 2B attached.

There are two principals of TVDKFG, Patrick Von Dohlen and Michael Knuffke. Patrick Von Dohlen is a Managing Member and was born in 1969. Michael Knuffke is a Managing Member and Chief Compliance Officer and was born in 1961. Their information is as follows:

ADV Part 2B Brochure Supplement - Patrick Von Dohlen

Item 1 – Cover Page

Patrick Von Dohlen

CRD # 2982207

The Von Dohlen Knuffke Financial Group, LLC 45 NE Loop 410, Suite 100 San Antonio, TX 78216 www.tvdkfg.com 210-344-3221

This Brochure supplement provides information about Patrick Von Dohlen and supplements The Von Dohlen Knuffke Financial Group, LLC ("TVDKFG") Brochure. You should have received a copy of that Brochure. Please contact Michael Knuffke if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about TVDKFG and Patrick Von Dohlen is available on the SEC's website at <u>www.Advisorinfo.sec.gov</u>.

The Von Dohlen Knuffke Financial Group, LLC

Item 2 - Educational Background and Business Experience

Full Legal Name: Patrick Richard Von Dohlen Year of Birth: 1969

Education

Bachelor of Science in Agricultural Economics Texas A&M University, College Station, TX

Designations LUTCF year American College, Bryn Mawr, PA

Minimum Designation Requirements

Life Underwriter Training Council Fellow (LUTCF) 2006

Issuing Organization: The American College

Prerequisites/Experience Required: Member of the local National Association of Insurance and Financial Advisors (NAIFA)

Educational Requirements: 6 courses: 1 required and 5 elective courses

Examination Type: Proctored online examination

Continuing Education/Experience Requirements: 3 hours of ethics-related continuing education for every 2 years

Business History

| December 2014 – Present | Managing Member at The Von Dohlen Knuffke Financial Group, LLC |
|---------------------------|----------------------------------------------------------------------------------|
| May 2007 – December 2014 | IAR and Registered Representative at Next Financial Group Inc. |
| July 2006 – May 2007 | Registered Representative and Agent at New England Financial |
| December 1997 – July 2006 | Registered Representative and Agent at New York Life and NYLIFE Securities, Inc. |

Item 3 – Disciplinary History

Neither TVDKFG nor Patrick Von Dohlen has any disciplinary history to disclose.

Item 4 – Other Business Activities

Patrick Von Dohlen may recommend insurance products and may also, as independent insurance agents, sell those recommended insurance products to Clients. The sale of these products accounts for approximately 5% of his time. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed Investment Advisor Representatives earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all Investment Advisor Representatives disclose this conflict of interest when such recommendations are made. Also, we require Investment Advisor Representatives to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

Patrick Von Dohlen shares a 50% ownership in The Von Dohlen Knuffke Financial Group, Inc., which offers business management planning and consulting. This role accounts for approximately 15% of his time.

Patrick Von Dohlen also has various investments in companies where he serves as manager, principal, member, or board member. Most of Patrick's outside business activities are not investment related and require him to maintain books and records, supervise staff, and attend board meetings as necessary. Please see item 10 "Other Financial Industry Activities and Affiliations" above, which includes a list of the various outside business activities of Patrick Von Dohlen, Michael Knuffke, and TVDKFG.

Item 5 – Additional Compensation

Patrick Von Dohlen may receive additional compensation for sales of insurance products and is eligible to receive incentive awards (including prizes such as trips or bonuses) for recommending certain types of insurance policies or other investment products that he recommends.

While Patrick Von Dohlen endeavors at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest, and may affect his judgment when making recommendations.

Item 6 - Supervision

Michael Knuffke is the Chief Compliance Officer and performs all supervisory duties for his firm.

Item 7 – Requirements for State-Registered Advisors

Patrick Von Dohlen has no reportable events to disclose here.

Performance Fees

We do charge a performance-based fee (fees based on a share of capital gains on, or capital appreciation of, the assets of a client) for our advanced level asset management accounts. We do not charge a performance based fee for our normal asset management clients.

Other Relationships

Neither the firm nor Patrick Von Dohlen has any relationship with any issuer of securities.

ADV Part 2B Brochure Supplement - Michael Raymond Knuffke

Item 1 – Cover Page

Michael Raymond Knuffke

CRD # 1126420

The Von Dohlen Knuffke Financial Group, LLC 45 NE Loop 410, Suite 100 San Antonio, TX 78216 www.tvdkfg.com 210-344-3221

This Brochure supplement provides information about Michael Knuffke and supplements The Von Dohlen Knuffke Financial Group, LLC ("The Von Dohlen Knuffke Financial Group") Brochure. You should have received a copy of that Brochure. Please contact Michael Knuffke if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about The Von Dohlen Knuffke Financial Group and Michael Knuffke is available on the SEC's website at <u>www.Advisorinfo.sec.gov</u>.

Item 2 - Educational Background and Business Experience

Full Legal Name: Michael Raymond Knuffke Year of Birth: 1961

Education

Texas Tech University, Lubbock, TX

Minimum Designation Requirements

Chartered Life Underwriter (CLU)

1996

Issuing Organization: The American College

Prerequisites/Experience Required: 3 years of full-time business experience within the five years preceding the awarding of the designation

Educational Requirements: 5 core and 3 elective courses

Examination Type: Final proctored exam for each course

Continuing Education/Experience Requirements: 30 hours every 2 years

Life Underwriter Training Council Fellow (LUTCF) 1989

Issuing Organization: The American College

Prerequisites/Experience Required: Member of the local National Association of Insurance and Financial Advisors (NAIFA)

Educational Requirements: 6 courses: 1 required and 5 elective courses

Examination Type: Proctored online examination

Continuing Education/Experience Requirements: 3 hours of ethics-related continuing education for every 2 years

Business History

| December 2014 – Present | Chief Compliance Officer and Managing Member at The Von Dohlen Knuffke Financial Group, LLC |
|--------------------------|---------------------------------------------------------------------------------------------|
| May 2007 – December 2014 | IAR and Registered Representative at Next Financial Group Inc. |
| October 2006 – May 2007 | Registered Representative and Agent at New England Financial |
| May 2000 – October 2006 | Registered Representative and Agent at Metlife Securities, Inc. |

Item 3 – Disciplinary History

Neither The Von Dohlen Knuffke Financial Group nor Michael Knuffke has any disciplinary history to disclose.

Item 4 – Other Business Activities

Michael Knuffke may recommend insurance products and may also, as independent insurance agents, sell those recommended insurance products to Clients. The sale of these products accounts for approximately 10% of his time. When such recommendations or sales are made, a conflict of interest exists as the

Insurance licensed Investment Advisor Representatives earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all Investment Advisor Representatives disclose this conflict of interest when such recommendations are made. Also, we require Investment Advisor Representatives to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

As a Managing Member of The Von Dohlen Knuffke Financial Group, LLC, Michael Knuffke shares a 50% ownership in this LLC. Similarly, Michael Knuffke owns 50% of The Von Dohlen Knuffke Financial Group, Inc., a Texas Corporation. This role accounts for approximately 10% of his time.

Michael Knuffke also has various investments in companies where he serves as manager, principal, member, or board member. Most of Michael's outside business activities are not investment related and require him to maintain books and records, supervise staff, and attend board meetings as necessary. Please see item 10 "Other Financial Industry Activities and Affiliations" above, which includes a list of the various outside business activities of Michael Knuffke, Patrick Von Dohlen, and TVDKFG.

Item 5 – Additional Compensation

Michael Knuffke may receive additional compensation for sales of insurance products and is eligible to receive incentive awards (including prizes such as trips or bonuses) for recommending certain types of insurance policies or other investment products that he recommends.

While Michael Knuffke endeavors at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest, and may affect his judgment when making recommendations.

Item 6 – Supervision

Michael Knuffke is the Chief Compliance Officer and performs all supervisory duties for his firm.

Item 7 – Requirements for State-Registered Advisors

Michael Knuffke has the following reportable event to disclose:

Mr. Knuffke has one reportable judgment/lien disclosure:Lien Type/Holder:Tax/Internal Revenue ServiceLien Outstanding:Yes

Performance Fees

We do charge a performance-based fee (fees based on a share of capital gains on, or capital appreciation of, the assets of a client) for our advanced level asset management accounts. We do not charge a performance based fee for our normal asset management clients.

Other Relationships

Neither the firm nor Michael Knuffke has any relationship with any issuer of securities.