
Form ADV Part 2

Item 1 – Cover Page

Integrity Wealth Management, LLC
190 Bares Run Drive, Loveland, OH 45140
(513) 289-6946
Firm CRD #130422
www.iwmcfp.net
January 31, 2019

This Brochure provides information about the qualifications and business practices of Integrity Wealth Management, LLC. If you have any questions about the contents of this Brochure, please contact us at (513) 289-6946 or email us at info@iwmcfp.net. 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.

Integrity Wealth Management, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you can use to decide whether to hire or retain an Adviser.

Additional information about Integrity Wealth Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This IWM Brochure was prepared according to the SEC’s new requirements and rules. This document contains updates to the IWM Brochure dated February 26, 2018.

This Item will discuss specific material changes that are made to the Brochure and provide clients with a summary of such changes. We also reference the date of our last annual update of our brochure.

This amendment is an update of IWM’s Form ADV Part 2A & 2B dated February 26, 2018. It updates IWM’s assets under management and serves as our annual update.

Pursuant to the Administrative Code of the State of Ohio, Department of Commerce, Division of Securities, we will offer our Form ADV, Part 2A to our clients annually. Form ADV Part 2B is attached to Form ADV Part 2A. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Janet S. Zorko, Chief Compliance Officer at (513) 289-6946 or info@iwmcfp.net. Our Brochure is also available on our web site www.iwmcfp.net. All copies are free of charge.

Additional information about IWM is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Integrity Wealth Management, LLC who are registered, or are required to be registered, as investment adviser representatives of Integrity Wealth Management, LLC.

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Item 4 – Advisory Business

Integrity Wealth Management, LLC (IWM) was founded in 2003 and is owned by Stephen G. Zorko. IWM provides comprehensive financial planning and specializes in investment advisory services. As of December 31, 2018, IWM had \$32.9M of discretionary assets under management and \$0.0M non-discretionary assets under management.

Financial planning includes investment, tax, insurance, education, retirement and estate planning. Financial planning services may include consultations and/or written plans which analyze a client's financial situation and recommendations on strategies and methods of implementing the strategies.

IWM's investment management service consists of management of client portfolios. The portfolios are managed using an asset allocation model that considers the client's age, risk tolerance, financial condition and financial goals. The results of this activity are detailed portfolios with recommendations of specific securities for each asset class and subclass. This service is provided to all IWM clients and the fees for these services are listed in Item 5. IWM does not have a minimum portfolio size requirement.

IWM develops Investor Policy Statements (IPS) with its clients to establish investment objectives and asset allocation guidelines.

IWM will furnish a written statement to its financial planning and investment advisory clients when a conflict of interest exists between the interests of IWM and the interests of the client. The client is under no obligation to act upon IWM's recommendations, and if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through IWM.

IWM's clients may impose restrictions on investing in certain securities or types of securities.

IWM does not participate in any wrap fee programs.

Item 5 – Fees and Compensation

IWM manages client investments on a discretionary basis for a percentage of the assets under management. IWM's fee structure is listed in the table below. Fees are negotiable depending on the size and complexity of a client's account.

Assets Under Management	Maximum Fee per Annum for Investment Balances (Equities, Fixed Income and Alternative Investments)	Maximum Fee per Annum for Cash Balances (Money Markets)
\$1,500,001 and Above	0.80%	0.20%
\$1,000,001 to \$1,500,000	0.90%	0.20%
\$500,001 to \$1,000,000	1.00%	0.20%
\$1 to \$500,000	1.10%	0.20%

IWM computes assets under management at the end of each quarter in the calendar year. IWM uses month end balances in the clients' accounts to compute the average quarterly account balances for investments and for cash. The average quarterly balances for investments and cash are multiplied by (1/4) of the clients' agreed upon fee level for investments and cash. Fees are billed in arrears 15-30 days after the end of each quarter.

The specific way fees are billed by IWM is established in a client's written agreement with IWM. Clients may elect to be billed directly for fees or to authorize IWM to directly debit fees from client accounts. Accounts initiated or terminated during a quarter will be charged a prorated fee. Clients may terminate their Investment Advisory Agreements at any time and without penalty.

Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as brokerage commissions, transaction fees, 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 and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to IWM's fee, and IWM shall not receive any portion of these commissions, fees, and costs.

IWM offers financial planning services to its investment advisory clients at no additional cost. Clients have the option of using this service and participating in the financial planning process. IWM also offers financial planning as a separate service to clients that are not investment advisory clients. Our financial planning fee is a maximum of \$100 per hour and depends on plan complexity. Clients will receive an estimate of the cost prior to engagement and the fee is paid upon completion of the plan.

IWM discloses to its clients that lower fees for comparable services may be available from other sources.

Item 6 – Performance-Based Fees and Side-By-Side Management

IWM does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

IWM provides portfolio management services to individuals, high net worth individuals, Taft-Hartley plans, charitable institutions, foundations, endowments and trust programs. IWM does not require account minimums.

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

The investment strategies that IWM employs are generally based on asset allocation models. The models account for the client's age, time horizon, financial condition, risk tolerance and investment goals. Types of investments used include equity securities (exchange listed securities, securities traded over-the-counter and foreign issuers), corporate debt securities, CD's, municipal securities, investment company securities (variable life insurance, variable annuities and mutual fund shares), U.S. government securities, options contracts (securities and commodities) and partnership interests (real estate and oil & gas).

IWM selects securities based on fundamental and technical analysis. Sources of research include financial newspapers and magazines, independent research materials, corporate rating services, annual reports, prospectuses and filings with the SEC.

Investment strategies utilize both long term and short-term purchases. Option writing (covered options, uncovered options and spreading strategies) may be used to generate income for clients and protect against risk of loss.

Investing in capital markets involves risk of loss that each client should be prepared to bear. Investing in foreign stock markets involves additional risks including political, economic, and currency risks, as well as differences in accounting methods. Investing in fixed income instruments may involve certain costs and risks such as liquidity risk, interest rate risk, and credit risk. Portfolios investing in derivatives could lose more than the principal amount invested in those instruments. There can be no guarantee that a portfolio will meet its investment objectives or that it will not suffer losses.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that are material to your evaluation of IWM or the integrity of IWM's management. Neither IWM nor any of its management personnel have been involved in any legal or disciplinary events. IWM has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Stephen G. Zorko's role as the Managing Director of IWM is his primary profession. Most of his time is devoted to IWM. He provides consulting to the aerospace materials industry on a limited basis.

IWM nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

IWM nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

IWM does not select other advisors for its clients.

Item 11 – Code of Ethics

IWM has adopted the Code of Ethics developed by the Financial Planning Association. This Code applies to all personnel of the firm. The Code of Ethics describes IWM's high standard of business conduct and fiduciary duty to its clients. 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 and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at IWM must acknowledge the terms of the Code of Ethics annually, or as amended.

IWM anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which IWM has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which IWM, its affiliates and/or clients, directly or indirectly, have a position of interest. IWM's employees and persons associated with IWM are required to follow IWM's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of IWM and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for IWM's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of IWM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of IWM's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between IWM and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with IWM's obligation of best execution. In such

circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. IWM will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. 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.

IWM's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Janet S. Zorko.

It is IWM's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. IWM will not cross trade between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

IWM nor any of its related persons recommend to clients or buy or sell for clients' accounts, investments in which IWM or its related persons have a material financial interest.

Item 12 – Brokerage Practices

IWM recommends broker-dealers for client transactions based on the reasonableness of their trading costs and receiving the most favorable execution of client transactions. IWM does not receive any Soft Dollar Benefits which are defined as research or other products and services that are in connection with client securities transactions. IWM does not receive referrals or have any conflict of interest as a result of recommending broker-dealers.

IWM recommends Fidelity Investments as a broker-dealer for its clients based on Fidelity's trading costs, execution and overall service. IWM's clients are free to select a broker-dealer of their choice.

Item 13 – Review of Accounts

Managed accounts are reviewed daily. Financial planning accounts are reviewed annually. The calendar is the triggering factor. Stephen G. Zorko and Janet S. Zorko review all client accounts. The review of client accounts is performed on a portfolio analysis basis. If the review identifies changes needed for the accounts to conform to the client's investment policy statement, the review findings and proposed actions will be documented and submitted to the client.

IWM's client receive written monthly statements from the custodian of the clients' assets. The statements contain detailed information including but not limited to the following: account holdings, income from holdings, realized gains and losses, beginning and ending values, deposits, withdrawals, investment advisory fees, detailed transaction history and cost basis. Upon request from the clients, IWM will prepare supplemental written reports detailing asset allocation and performance of investments relative to benchmarks.

Item 14 – Client Referrals and Other Compensation

IWM does not receive any economic benefit from anyone who is not a client for providing investment advice or other advisory services to our clients.

IWM or any related persons do not, directly or indirectly, compensate any person for client referrals.

Item 15 – Custody

IWM withdraws advisory fees directly from our clients' accounts per the following safeguards. IWM has custody of client funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee. IWM has written authorization from our clients to deduct advisory fees from the accounts held with the qualified custodian. Each time a fee is directly deducted from a client account, IWM will send the qualified custodian a statement listing the amount of the fee to be deducted from the client's account. The qualified custodian concurrently deducts the fee and itemizes the fee as an Advisor Fee. This information is shown online in the account history and on the statement received by the clients. The formula used to calculate the fee is defined in Item 5 of this document and in IWM's Investment Advisory Agreement. IWM maintains policies and procedures to ensure

the fee is calculated correctly. IWM's records detail the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee. This information is available to IWM's clients upon request. IWM is committed to following these safeguards.

Item 16 – Investment Discretion

IWM usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the client account.

When selecting securities and determining amounts, IWM observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, IWM's 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. Investment guidelines and restrictions must be provided to IWM in writing.

Item 17 – Voting Client Securities

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

Item 18 – Financial Information

IWM does not solicit or require prepayment of fees from its clients. Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about IWM's financial condition. IWM has no financial commitments that impair its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

IWM requires that individuals from the firm that are involved in determining or giving of investment advice to clients have a minimum of a bachelor's degree, passed the Series 65 examination and a minimum of 5 years of experience in the financial planning or investment advisory industries.

The principal executive officers and management persons of IWM are as follows:

- Stephen G. Zorko, Managing Director
- Janet S. Zorko, Chief Compliance Officer

The formal education and business background of these individuals are detailed in their Form ADV Part 2B which are attached to this document.

IWM, its management persons and its supervised persons are not compensated for advisory services with performance-based fees.

IWM and its management persons have not been involved in any event involving 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.

IWM and its management persons have not been involved in any event involving 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.

IWM and its management persons do not have any relationship or arrangement with any issuer of securities that is not listed in Item 10.C. of Part 2A.

IWM attests that any material conflicts of interest have been disclosed in writing to its clients.

IWM maintains a written Business Continuity Plan that defines procedures relating to an emergency or significant business disruption including death or incapacitation of the firm or any of its representatives.

Form ADV Part 2B for Stephen G. Zorko

Item 1- Cover Page

Stephen G. Zorko

Integrity Wealth Management, LLC

190 Bares Run Drive, Loveland, OH 45140

(513) 289-6946

Individual CRD # 4761332

January 31, 2019

This Brochure Supplement provides information about Stephen G. Zorko that supplements the Integrity Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Janet S. Zorko if you did not receive Integrity Wealth Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Stephen G. Zorko is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Zorko, Stephen Gerard

- **2003 – Current, Integrity Wealth Management, LLC, Managing Director & Investment Advisor Representative**
- **2007 – Current, Certified Financial Planner, CFP®, Continuing Education**
- 2007, Certified Financial Planner, CFP®, Minimum Qualifications Include:
 - Education Requirement – Complete college or university-level coursework through a program registered with CFP Board
 - CFP Exam Requirement – Pass CFP Certification Exam
 - Experience Requirement – Requirement can be satisfied with the 3 Year Option (6,000 hours) or 2 Year Apprenticeship Option (4,000 hours)
 - Ethics Requirement – Adhere to CFP Board’s Standards of Professional Conduct
- 2005, Kaplan University, Financial Planning Certificate
- 2004, NASD, Series 65 Examination, Minimum Qualifications Include:
 - Complete Form U-10 and Pass Series 65 Uniform Investment Advisor Law Exam
- 2016 – 2017, Carpenter Technology Corp., Director – Corporate Development
- 2005 – 2015, Alcoa (Formerly Firth Rixson Ltd), Commercial Executive
- 2001 – 2005, Spectrum Metals, Inc., Executive Vice President
- 1999, University of Cincinnati, Executive Program
- 1996 – 2001, Polymet Corp., President
- 1992 – 1996, Interturbine, Vice President & General Manager
- 1985 – 1992, GE Aviation, Manager of Operations
- 1988, University of Cincinnati, M.S. Mechanical Engineering

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- 1985, The Ohio State University, B.S. Welding Engineering
 - 1980 – 1987, US Army, OHNG, Attack Helicopter Troop, Flight Operations Coordinator
 - 1977, Boy Scouts of America, Eagle Scout
 - 1976 – 1980, St. Edwards High School
 - Born in 1962

Stephen G. Zorko is a Certified Financial Planner (CFP®). Maintaining this certification requires Stephen to complete 30 hours of continuing education in every 2 years. Of the 30 hours, a minimum of 2 hours must be completed on the CFP Board Practice Standards and Ethics.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Stephen G. Zorko has not been involved in any legal or disciplinary events.

Item 4- Other Business Activities

Stephen G. Zorko is not actively engaged in any other investment-related business or occupation. IWM is fee based and the sole source of income is from client fees. Stephen does not receive any fees, commissions, bonuses or other compensation based on the sale of securities or other investment products. Commissions paid by IWM's clients to complete trades with Fidelity Investments are paid entirely to Fidelity Investments. The compensation structure ensures that no material conflicts of interest exist, and Stephen can recommend investments that are in the best interests of clients.

Stephen G. Zorko's role as the Managing Director of IWM is his primary profession. Most his time is devoted to IWM. On a limited basis, he provides strategy and corporate development consulting to the aerospace materials industry.

Item 5- Additional Compensation

Integrity Wealth Management is the only firm for which Stephen G. Zorko provides advisory services and does not receive economic benefits from any other firm. Stephen G. Zorko does not receive any compensation for performing advisory services other than what is disclosed in Part 2A (Item 5).

Item 6 - Supervision

Stephen G. Zorko's activities are supervised by Janet S. Zorko, the Chief Compliance Officer of Integrity Wealth Management. Janet S. Zorko can be reached at (513) 289-6946.

Item 7- Requirements for State-Registered Advisers

Stephen G. Zorko has not been subject to an award or otherwise found liable in an arbitration claim alleging any damages.

Stephen G. Zorko has not been subject to an award or otherwise found liable in any civil, self-regulatory organization or administrative proceeding.

Stephen G. Zorko has not been the subject of a bankruptcy petition.

Form ADV Part 2B for Janet S. Zorko

Item 1- Cover Page

Janet S. Zorko

Integrity Wealth Management, LLC
190 Bares Run Drive, Loveland, OH 45140
(513) 289-6946

Individual CRD # 4876924

January 31, 2019

This Brochure Supplement provides information about Janet S. Zorko that supplements the Integrity Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Janet S. Zorko if you did not receive Integrity Wealth Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Janet S. Zorko is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Zorko, Janet Susanne

- **2004 – Current, Integrity Wealth Management, Chief Compliance Officer & Investment Advisor Representative**
- 2004, NASD, Series 65 Examination, Minimum Qualifications Include:
 - Complete Form U-10 and Pass Series 65 Uniform Investment Advisor Law Exam
- 2006 – Current, St. Columban Parish, Prayer Chain Chairperson
- 2006 – Current, Loveland Inter Faith Effort, Lead Volunteer
- 2005 – 2018, Integrity Realty Management, Owner
- 1997 – 2006, St. Columban Parish, Volunteer
- 1993 – 1994, St. John’s Catholic Community, Ways & Means Committee Chairperson
- 1992 – 1995, St. John’s Catholic Community, Pro-Life Chairperson
- 1984 – 1990, Adia Personnel Services, Account Manager
- 1984, Xavier University, B.A. Business Administration
- 1980, Mt. Notre Dame High School
- Born in 1962

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Janet S. Zorko has not been involved in any legal or disciplinary events.

Item 4- Other Business Activities

Janet S. Zorko is not actively engaged in any other investment-related business or occupation.

IWM is fee based and the sole source of income is from client fees. Janet does not receive any fees, commissions, bonuses or other compensation based on the sale of securities or other investment products. Commissions paid by IWM's clients to complete trades with Fidelity Investments are paid entirely to Fidelity Investments. The compensation structure ensures that no material conflicts of interest exist, and Janet can recommend investments that are in the best interests of clients.

Janet S. Zorko's primary profession is that of providing financial planning and investment advice through IWM. In addition to her employment with IWM, she owns Integrity Realty Management, LLC. This position is part-time and does not detract from her ability to perform her duties at Integrity Wealth Management, LLC.

Item 5- Additional Compensation

Integrity Wealth Management is the only firm for which Janet S. Zorko provides advisory services and does not receive economic benefits from any other firm. Janet S. Zorko does not receive any compensation for performing advisory services other than what is disclosed in Part 2A (Item 5).

Item 6 - Supervision

Janet S. Zorko's activities are supervised by Stephen G. Zorko, the President of Integrity Wealth Management. Stephen G. Zorko can be reached at (513) 633-8370.

Item 7- Requirements for State-Registered Advisers

Janet S. Zorko has not been subject to an award or otherwise found liable in an arbitration claim alleging any damages.

Janet S. Zorko has not been subject to an award or otherwise found liable in any civil, self-regulatory organization or administrative proceeding.

Janet S. Zorko has not been the subject of a bankruptcy petition.