

Form ADV Part 2A Disclosure Brochure

JTD Financial Services, LLC

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Updated: January 23, 2020

This brochure provides information about the qualifications and business practices of JTD Financial Services, LLC. If you have any questions about the contents of this brochure please call us at (603) 641-1010 or email us at fdemaio@jtdfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about JTD Financial Services, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Registration or licensing as an investment advisor does not imply a certain level of skill or training.

Item 2. Material Changes

The following changes have been made to this brochure since its last annual updating amendment on January 29, 2019:

• Item 4 was updated to reflect discretionary assets under management of \$9.308 million and non-discretionary assets under management of \$3.585 million as of December 31, 2019.

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Item 4. Advisory Business

JTD Financial Services, LLC (JTD, Firm) is located in Bedford, New Hampshire and provides investment advisory services to its advisory clients. JTD has been in the business of providing investment advisory services since 2008.

Frank DeMaio is the owner, President and Chief Compliance Officer of JTD Financial Services, LLC.

JTD offers personalized investment advisory services to clients based on the individual needs of the client. Factors that JTD considers in managing client accounts or making recommendations include the client's financial situation, investment objectives, risk tolerance levels, goals and objectives. JTD's services and fee arrangements are described in the following pages.

Portfolio Management and Review Services

JTD provides Portfolio Management and Review Services in which JTD gives continuous investment advice to a client and makes investments for the client based on the individual needs of the client. Through this service, JTD offers a highly customized and individualized investment program for clients. We work with each client to develop a specific investment strategy and investment policy that focuses on the client's goals and objectives. As of December 31, 2019, JTD manage discretionary assets of \$9.308 million and non-discretionary assets of \$3.585 million.

JTD and its Investment Advisor Representatives (IARs) may provide portfolio management services through accounts maintained at the custodian of the client's account (please see Item 12 of this brochure for more information regarding custodian selection). Under the client's Portfolio Management and Review Services agreement, JTD and the client's IAR will be granted trading authorization over the client's account on either a discretionary or non-discretionary basis.

JTD may also provide asset review services on accounts in which trading authorization is not granted. While under the Portfolio Review Service JTD provides ongoing review services of the client's assets, it is necessary for the client to implement all trades in the account. The client's custodian will maintain custody of all funds and securities.

Third-Party Investment Advisors

JTD also acts as a solicitor and refers clients to unaffiliated third-party investment advisors (TPIAs) that offer asset management services to clients. When clients undertake a TPIA for the management of their accounts, JTD is paid a portion of the fee charged and collected by the third-party investment advisor in the form of solicitor or consulting fees. Each of JTD's solicitation arrangements with TPIAs is performed pursuant to a written solicitation agreement between JTD and the TPIA and will be in compliance with all applicable regulations governing solicitor relationships.

After gathering information about a client's financial situation and investment objectives, JTD may recommend specific services or programs of one or more TPIAs to clients that are suitable and appropriate for the client based on the clients' individual needs and circumstances, including investment objectives and risk tolerance levels, as they have made them known to JTD. Factors that JTD takes into consideration when making such recommendations include, but are not limited to, the TPIA's performance, methods of analysis and fees. JTD regularly reviews the TPIA and its performance for continued consistency with the client's investment objectives and risk tolerances.

At the time of the referral, clients who are referred to TPIAs will receive the relevant TPIA's Form ADV Part 2 and other relevant disclosure documents. These documents are designed to provide complete disclosure of the TPIA, including services rendered, fee schedules and the compensation to be paid to JTD as a result of the referral.

Financial Planning Services

Upon execution of a Financial Planning Agreement, JTD provides written financial planning services for a specified fee to clients. Written financial plans may be specific or modular in their preparation and, as each client's circumstances and needs are unique, both the areas covered by a plan and the advice we provide

may differ from client to client. Topics included in a financial plan may include, but are not necessarily limited to, the following: retirement planning, college planning, and insurance planning.

Changes to Financial Status

Clients may consult with JTD at any time concerning their account. Every client is urged to notify JTD as soon as is practicable of changes in financial status or goals, as these types of changes may affect our recommendations.

Item 5. Fees and Compensation

Portfolio Management and Review Services

In JTD's Portfolio Management and Review Service, JTD's annual management fee ranges up to 1.25% of the clients' assets under management or review as agreed upon in the Portfolio Management and Review Services Agreement.

The fee charged to each client is negotiable based on factors such as the client's financial situation and circumstances, the amount of assets under management or review, whether JTD will have trading authorization over the client's account, and the overall complexity of the services provided. The exact services and fees will be agreed upon and disclosed in the agreement for services prior to services being provided.

Fees for JTD's services are divided and billed quarterly in advance based on the value of the account at the end of the previous quarter. JTD generally prefers to deduct its fees directly from the client's account, which may only be done with written client authorization. Prior to any fees being deducted from the account, JTD will provide clients with a fee notification. The fee notification will show the amount of fees for the quarter, the manner in which the fees were deducted, any adjustments to the fees, and explanations of any adjustments. If the client so desires, and with JTD's consent, the client may pay fees directly to JTD. For clients that pay fees directly, payment is due upon receipt of the billing statement from JTD. The custodian will send client statements, at least quarterly, showing all disbursements from the client's account, including the amount of the advisory fee, if deducted directly from the account. Clients should review their account statements carefully for accuracy.

Either the client or JTD may terminate the agreement for services at any time. If services are terminated within five (5) business days of executing the agreement, services will be terminated without penalty and a full refund of any pre-paid fees will be provided. If services are terminated after the initial five-day period, the client will receive a pro-rated refund based on the number of days service is provided during the final period. In the event a client terminates services, termination shall be effective from the time JTD receives written notification or such other time as may be mutually agreed upon, subject to the settlement of transactions in progress and the final payment of advisory fees. There will be no penalty charge upon termination. In the event that JTD terminates the relationship, the agreement will be terminated on the 30th (thirtieth) day after written notification is delivered to the client or such other time as may be mutually agreed upon, also subject to the settlement of transactions in progress and the final payment of advisory fees.

Third-Party Investment Advisor Referral Services

JTD will receive compensation as provided for in its agreements with TPIAs for introducing clients. The compensation to JTD is typically equal to a percentage of the investment advisory fee charged by that TPIA and is disclosed to the client in the TPIAs Form ADV Part 2 or Solicitors Disclosure Statement.

Since the fee for the JTD's services is paid by the independent TPIA, the fee paid to JTD is generally not negotiable. Fees paid by clients to independent TPIAs are established and payable in accordance with the Form ADV Part 2 or other equivalent disclosure provided by each independent TPIA to whom JTD refers its clients, and may or may not be negotiable, as disclosed in the disclosure documents of the TPIA.

Certain programs may charge a "wrap fee", which is single periodic fee that is charged to the client for both brokerage and investment management services. Selection of a wrap fee program may result in the payment of fees by clients that exceed the combined total of separate advisory fees and brokerage commissions the client might otherwise pay if the account was not a wrap fee account. If a wrap fee program

is not selected, the client will be charged separately the management fee by the TPIA and transaction charges by the securities broker-dealer.

Clients will sign an advisory agreement directly with the TPIA of the program selected. The advisory relationship may be terminated by the Client, JTD, or the TPIA in accordance with the provisions of those agreements. The client will typically receive a pro-rata refund of any prepaid advisory fees upon termination of the advisory agreement with a TPIA, as specified in the Clients agreement with the TPIA.

Financial Planning Services

JTD charges a fixed fee for its written financial planning services, which is negotiable and will generally not exceed \$1,000, depending on the complexity of the client's situation and nature of the services requested. Fees are due in advance upon execution of the Financial Planning Agreement. Financial planning services terminate upon presentation of the written plan.

The client may terminate the Financial Planning Agreement prior to presentation of the written financial plan with no penalty and a full refund of all pre-paid fees will be provided. At no time will fees be charged more than six months in advance of services rendered.

Implementation of Financial Planning Recommendations

While financial planning services are prepared with the intention of the client implementing recommendations made within the plan (such as the purchase of insurance products) through JTD or JTD's IARs, clients are not obligated to do so. If clients elect to have an IAR of JTD implement the advice provided as part of the financial planning services, implementation will be made through JTD's services described above (Portfolio Management and Review or TPIA services).

JTD's IARs that are licensed as insurance agents may receive commissions and other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of this compensation may affect the judgment of JTD's IARs when recommending products to its clients. Clients are under no obligation to implement insurance product recommendations through JTD or a JTD IAR.

While JTD has procedures in place that endeavors to at all time to put the interest of the clients first as a part of the JTD's fiduciary duty, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

Additional Fees and Expenses

Mutual Fund and Other Internal Investment Charges

When recommending mutual funds in the Portfolio Management and Review Service, JTD generally recommends only no-load or load-waived mutual funds. However, all mutual funds, exchange traded funds and other investment company securities (Funds) incur certain types of charges and expenses, which are paid from the value of the mutual funds' shares. These charges and expenses include investment management, transaction, administrative, distribution, transfer agent, custodial, legal, audit and other customary fees. If your account holds any such Fund shares, you will be indirectly paying these expenses, which are in addition to your Portfolio Management and Review Service management fee. You are encouraged to read the prospectuses of any Funds which are purchased in your account for a more complete explanation of these fees and expenses.

Investments Available without JTD's Services

With certain exceptions, you can purchase shares of Funds and other investments outside of your Portfolio Management and Review account without paying for and receiving the benefit of JTD's management services. Certain Funds are offered generally to the public without a sales charge and, for those Funds that are offered with a sales charge, the sales charge described in the Fund's Prospectus may be more or less than the Portfolio Management and Review Service management fee.

Tax Consequences of Transactions

Clients are advised that any redemptions and exchanges between Funds and other securities transactions

in the clients Portfolio Management and Review account might have tax consequences, which clients should discuss with their independent tax advisor.

Brokerage and Custodial Charges

In addition to JTD's Portfolio Management and Review fee, you will also pay any brokerage or custodial costs associated with your account. For more information about JTD's brokerage recommendations and arrangements, please refer to Item 12. of this brochure.

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

JTD does not charge fees based on a share of capital gains up or capital appreciation of the assets in a client's account.

Item 7. Types of Clients

While JTD generally provides services to individuals, trusts, estates and charitable organizations, it may also provide advice to other types of clients on a case by case basis.

JTD has a minimum account size of \$250,000 for its Portfolio Management and Review Service. Depending on the client's specific circumstances, JTD may waive this minimum at its sole discretion.

Minimum account sizes for TPIA referral programs vary and are disclosed in their respective disclosure materials.

<u>Item 8. Methods of Analysis, Investment Strategies and Risk of Loss</u> Methods of Analysis, Investment Strategies

JTD's methods of analysis include charting analysis, fundamental analysis, and technical analysis. The main sources of information JTD uses include stock charts, financial newspapers and magazines, research materials prepared by others, corporate ratings services, annual reports, prospectuses and other filings with the Securities and Exchange Commission, as well as company press releases.

Investment Strategies

In the management of client accounts, JTD primarily uses long-term purchases, but may also use any of the following investment strategies when appropriate: long- and short-term purchases, trading of securities (selling securities within 30 days of purchase), margin transactions and options writing.

Risk of Loss

All investments and investment programs have certain risks that are associated with them and which the investor must bear. Following are the types of risk that may arise to clients due to the types of securities that are recommended to or purchased for clients:

Business Risk – the risk that the price of an investment will change due to factors unique to that company, investment or market segment and not the market in general.

Liquidity Risk – the risk associated with the ease of being able to quickly convert the value of a security into an equivalent amount of cash. For example, money market funds are readily convertible (liquid) while certain limited partnership units or real estate are not.

Financial Risk – the risk to specific companies' future earnings due to their use of debt. Companies that borrow money must pay it back at some future date, plus the interest charges. This increases the uncertainty about the company because it must have enough income to pay back this amount at some time in the future.

Exchange Rate (Currency) Risk – the risk that investors in foreign investments may be subject to different exchange rates at the time they wish to convert investment proceeds back to their home currency. If exchange rate risk is high, even though substantial profits may have been made in the foreign markets, a less favorable exchange rate may reduce or eliminate these profits.

Country (Political) Risk – the risk that a major change in the political or economic environment of a foreign country may devalue investments made in that country. This risk is usually restricted to emerging or developing countries that do not have stable economic or political environments.

Market Risk – the risk that the price of a particular investment will change as a result of overall market conditions that are not specific to that particular company or investment.

Interest Rate Risk – the risk that interest rate changes will affect the price of a particular investment. For example, when interest rates rise, the price of bonds generally fall.

The specific risks associated with TPIA programs are disclosed in the TPIAs disclosure brochure.

Item 9. Disciplinary Information

JTD and its management personnel have not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management.

Item 10. Other Financial Industry Activities and Affiliations

Because JTD and its representatives receive compensation from the Third-party Investment Advisors for referring clients and because such compensation may differ depending upon the individual agreement with each TPIA, JTD and/or its representatives may have an incentive to recommend one of these TPIAs over other TPIAs with which it has less favorable compensation arrangements, or other advisory programs offered by TPIAs with which it has no compensations arrangements. JTD has procedures in place to ensure that TPIAs are recommended based on their interest of the client regardless of the amount of compensation earned. JTD shall not recommend the use of an outside investment advisor unless the investment advisor is registered/notice filed or exempt from registration/notification in the client's home state.

Insurance Companies

Frank DeMaio is also a licensed insurance agent with various insurance companies. Mr. DeMaio may occasionally offer clients fixed insurance and annuity products from these companies. If you purchase products from him in this capacity, then he will receive commissions from their sale. This is a possible conflict of interest, as his receipt of compensation from such recommendations can conflict with the fiduciary duties owed to clients by an investment advisor.

<u>Item 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</u> <u>Code of Ethics</u>

JTD has adopted a Code of Ethics (Code) that sets forth standards of business conduct, including compliance with applicable state and federal securities laws, that it requires of its officers, management and employees ("associated persons"). The Code is based on the principle that JTD and its associated persons have an overarching fiduciary duty to, at all times, place the interests of its clients first. The Code establishes that no person employed by JTD shall prefer their own or JTD's interests over those of advisory clients and, among other things, prohibit the use of material non-public information. A copy of the firm's Code is available upon written request.

Participation or Interest in Client Transactions

JTD or its associated persons may for their own accounts, buy or sell securities identical to or different than those that may be recommended to clients. As these situations present a conflict of interest, JTD has adopted policies settings forth ethical standards of business conduct that it requires of its employees, including compliance with applicable state and federal securities laws. These policies stress that no person employed by the JTD shall prefer his/her own interests to those of advisory clients and prohibit the use of material non-public information.

Item 12. Brokerage Practices

Recommendation of Broker/Dealers for Portfolio Management Services

JTD participates in the Schwab Advisor Services (SAS) program offered to independent investment advisers such as JTD by Charles Schwab & Co., Inc. (Schwab). JTD requires clients who wish to use JTD's Portfolio Management Services to open an account with Schwab for brokerage and custody services. Schwab is a registered broker-dealer, a member of FINRA and SIPC, and is not affiliated with JTD. Schwab will hold your assets in a brokerage account and buy and sell securities when instructed to do so by JTD. While we require that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you.

Clients should be aware of the following important facts regarding JTDs exclusive use of Schwab:

- This limitation on the use of broker-dealers may affect JTD's ability to achieve most favorable execution of client transactions, and therefore may cost clients more money; and
- Not all investment advisors require clients to use specified broker-dealers.

As part of the SAS program, JTD receives benefits that it would not receive if it did not offer investment advice. SAS provides JTD with access to its institutional trading and operations services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors at no charge to them so long as the adviser meets Schwab minimum requirements for maintenance of clients' account assets at Schwab. SAS's services include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment.

SAS also makes available to JTD other products and services that benefit JTD but may not benefit its clients' accounts. Some of these other products and services assist JTD in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of JTD's fees from its clients' accounts, and assist with back-office support, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of JTD accounts, including accounts not maintained at Schwab.

SAS may also provide JTD with other services intended to help JTD manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services to JTD by independent third parties. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to JTD.

JTD's clients must evaluate any recommended broker-dealer and/or custodian, including Schwab, before opening an account. The factors considered by JTD when making brokerage and/or custodial recommendations are the firm's ability to provide professional services, JTD's experience with the firm, the firm's reputation, and the firm's quality of execution services and costs of such services, among other factors.

When JTD is placing transactions for your account at about the same time and for the same security as for other client accounts, it may aggregate your transaction with the transactions of other clients. This provides each client with average pricing for the transaction, so that no client is disadvantaged by when their account is traded versus when another client's account is traded. If an aggregated order is only partially filled, JTD has procedures in place to ensure that no client is systematically disadvantaged through the allocation process. In instances when JTD is placing multiple client trades in the same security at approximately the same time, and the security is priced intra-day rather than end-of-day, JTD has procedures in place to rotate accounts to ensure that no single client is systematically disadvantaged by where there transaction is placed in the trading queue. Even so, because each transaction is placed separately, not all clients will pay or receive the same price for the security and the price a particular client pays or receives may be higher or lower than that of other clients.

Clients are advised there is an incentive for JTD and its IARs to recommend a broker/dealer over another based on the products and services that will be received rather than the client's best interest.

Recommendation of Broker/Dealers for Portfolio Review Services

Clients who do not wish JTD to manage their account or who do not wish to open an account at Schwab may undertake JTD for its Portfolio Review Services and utilize the broker-dealer of their choice. In such cases, JTD does not generally recommend broker-dealers to clients.

When not permitting JTD to directly manage their account with discretion, clients should be aware of the following important facts:

- Clients, not JTD, are responsible for implementing recommended transactions,
- Clients will not be able to take advantage of average pricing resulting from JTD aggregating their trades with trades of other clients, and
- JTD may not be able to bill the client's account for JTD's advisory fees.

TPIA Brokerage Practices

TPIAs recommended by JTD have their own brokerage practices that are available for review in their respective disclosure brochures.

Item 13. Review of Accounts

Client accounts are reviewed by the assigned IAR on an as needed basis, but at least quarterly. The calendar is the main triggering factor, although more frequent reviews may be also be triggered by changes in client circumstances, client request, or unusual market activity.

Clients will receive statements at least quarterly from the custodian at which their accounts are maintained. In addition, JTD may provide clients with quarterly or on-demand position and performance reports upon request.

Item 14. Client Referrals and Other Compensation

JTD IARs, in their individual capacities as insurance agents, may from time to time receive incentive awards for the sale of insurance products. The receipt of these awards may affect their judgment in recommending insurance products to clients.

Item 15. Custody

Except for the direct billing of account fees (as authorized by clients in writing), JTD does not have any arrangements by which it accepts or undertakes custody of client funds or securities. Client funds and securities are always held with a qualified custodian, such as Schwab, who will provide the client with an account statement at least each calendar quarter. The account statement, which you should review carefully, shows the amount of JTD's management fees that are deducted from your account during the period covered by the statement.

<u>Item 16. Investment Discretion</u>

Portfolio Management Services

Accounts may be managed on a discretionary or non-discretionary basis; however, upon receiving written authorization from the client, JTD may provide discretionary investment management services for client accounts. When discretionary authority is granted, JTD will have the authority to determine the type of securities and the amount of securities that can be bought or sold for the client portfolio without obtaining the client's consent for each transaction.

TPIAs

TPIAs generally take discretionary authority to determine the securities to be purchased and sold for the client. Neither JTD nor its IARs will have any trading authority with respect to client's managed account with the TPIA nor will JTD have discretion to select a TPIA for a client without the client's explicit written consent.

Item 17. Voting Client Securities

JTD and its IARs do not perform proxy-voting services on a client's behalf. Clients are instructed to read through the information provided with the proxy voting documents and to make a determination based on the information provided. In some instances, upon request from the client, an IAR may give limited clarification based on their understanding of issues presented in the proxy-voting materials. However, the client will have the ultimate responsibility for making all proxy-voting decisions.

Item 18. Financial Information

JTD does not require or solicit the prepayment of any fees more than six months in advance of services rendered. Additionally, JTD does not have any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

<u>Item 19. Requirements for State-Registered Advisors</u>

Following is the formal education and business background of each of JTD's principal executive officers and management personnel:

Name: Frank G. DeMaio

Born: 1961

Education

BA - Fordham University

MSW - University of California, Berkeley

Recent Business Background

JTD Financial Services, LLC, President/Managing Member, 06/2007 - Present, and Investment Advisor Representative, 02/2008 - Present

United Planners' Financial Services of America, Registered Representative, 06/2008 – 12/2019 Sterling Financial Services, Advisor Representative, 01/2007 – 06/2008

Cambridge Investment Research, Inc., Registered Representative, 12/2006 - 06/2008

Cantella & Co., Financial Advisor, 08/2005 – 12/2006

Morgan Stanley, Financial Advisor, 05/1993 - 08/2005

CUSTOMER PRIVACY POLICY

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. JTD does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

JTD is committed to safeguarding the confidential information of its clients. JTD holds all personal information provided by clients in the strictest confidence and it is the objective of JTD to protect the privacy of all clients. Except as permitted or required by law, JTD does not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, JTD will provide clients with written notice and clients will be provided an opportunity to direct JTD as to whether such disclosure is permissible.

To conduct regular business, JTD may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to JTD
- Information about the client's transactions implemented by JTD or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for JTD to provide access to customer information within the firm and to nonaffiliated companies with whom JTD has entered into agreements with. To provide the utmost service, JTD may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on JTD's behalf.

- Information JTD receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with JTD or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with JTD

Since JTD shares nonpublic information solely to service client accounts, JTD does not disclose any nonpublic personal information about JTD's customers or former customers to anyone, except as permitted by law. However, JTD may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas.



Form ADV Part 2B Disclosure Brochure Supplement

for

Frank G. DeMaio

JTD Financial Services, LLC

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Website Address: www.jtdfinancial.com

Updated: January 23, 2020

This brochure supplement provides information about Frank G. DeMaio that supplements the JTD Financial Services, LLC disclosure brochure. You should have received a copy of that brochure. Please contact Frank G. DeMaio if you did not receive JTD Financial Services, LLC's disclosure brochure or if you have any questions about the contents of this supplement.

Item 2. Educational Background and Business Experience

Name: Frank G. DeMaio. CFA. CFP

Born: 1961

Education

BA – Fordham University

MSW - University of California, Berkeley

Recent Business Background

JTD Financial Services, LLC, President/Managing Member, 06/2007 - Present, and Investment Advisor Representative, 02/2008 - Present

United Planners' Financial Services of America, Registered Representative, 06/2008 – 12/2018 Sterling Financial Services, Advisor Representative, 01/2007 – 06/2008

Cambridge Investment Research, Inc., Registered Representative, 12/2006 – 06/2008

Cantella & Co., Financial Advisor, 08/2005 – 12/2006

Morgan Stanley, Financial Advisor, 05/1993 – 08/2005

Professional Designations

CFA - Chartered Financial Analyst

To earn a CFA charter, the candidate must:

- have four years of qualified investment work experience,
- become a member of the CFA institute,
- pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis,
- apply for membership to a local CFA member society, and
- complete the CFA Program.

The CFA program is organized into three levels, each culminating in a six-hour examination. Completing the program takes most candidates between two and five years.

CFP® - Certified Financial Planner

CFP® MINIMUM QUALIFICATIONS:

The Certified Financial Planner (CFP®) designation is a professional certification mark for financial planners conferred by the Certified Financial Planner Board of Standards, Inc. (CFP Board). To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements, and meet ongoing certification requirements, as follows:

- Bachelor's degree or its equivalent, in any discipline, from an accredited university
- Minimum 15-hour curriculum necessary to prepare for the CFP exam (you may challenge the
 educational requirements if you are a licensed attorney or are hold any of the following
 certifications or degrees: Certified Public Accountant, Chartered Financial Analyst, Chartered
 Financial Consultant, Chartered Life Underwriter, Doctor of Business Administration or PhD
 in business or economics)
- Apply for and achieve a passing score on the Certified Financial Planner exam
- Possess at least 3 years of work experience in the financial planning industry teaching, assisting, supervising or delivering financial planning services to a client base for a minimum of 3 years prior to certification
- Pass a background check and candidate fitness standards test. You must reveal any criminal history, pending litigation or ethical violations. The CFP board verifies all employment history, qualifications and disciplinary issues via FINRA's Central Registration Depository.

Item 3. Disciplinary Information

Frank DeMaio has not been involved in any legal or disciplinary events that are material to a client's evaluation of him or his integrity.

Item 4. Other Business Activities

In his individual separate capacity, Frank DeMaio is also a licensed insurance agent with various insurance companies. Mr. DeMaio may occasionally offer clients fixed insurance and annuity products from these companies. If you purchase products from him in this capacity, then he will receive commissions from their sale. This is a possible conflict of interest, as his receipt of compensation from such recommendations can give him an incentive to recommend investment products based on the compensation received, rather than on client needs

Item 5. Additional Compensation

Other than commission and related compensation from insurance sales, as disclosed above in Item 4, Frank DeMaio does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through JTD.

Item 6. Supervision

As owner and designated principal of JTD Financial Services, LLC, Frank DeMaio has ultimate and direct supervisory responsibility over all personnel and functional areas of JTD. Frank regularly reviews required reports and activities of JTD personnel for compliance with applicable requirements.

Item 7. Requirements for State Advisors

The following information is required by the State of New Hampshire. In addition to any events that may be listed in Item 3 of this brochure, we must disclose if Frank DeMaio has been involved certain arbitration claims, been found liable in a certain civil, self-regulatory organization, or administrative proceedings, or has been the subject of a bankruptcy petition. Frank DeMaio has nothing to disclose in these areas.