

**Item 1 – Cover Page**

Deem Asset Management, LLC  
Firm CRD # 315845  
Anthony J. Deem, President & Chief Compliance Officer

Form ADV Part 2A: Firm Brochure

2492 Country Club Dr.  
Uniontown, Ohio 44685

Phone: (330) 685-1975  
<https://deemasset.com/>

Effective: August 26, 2025

**This program brochure provides information about the qualifications and business practices of Deem Asset Management, LLC. If you have any questions about the contents of this brochure, please contact us at (330) 685-1975 or [a@deemasset.com](mailto:a@deemasset.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. Registration as a registered investment advisor does not imply a certain level of skill or training.**

**Additional information about Deem Asset Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 - Material Changes**

Pursuant to SEC Rules, we will deliver you a summary of any material changes to this and subsequent brochures at least annually or as necessary to ascertain information herein remains current.

Clients may access a current brochure at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

This Item summarizes the material changes to our firm brochure since the most recent “other-than-annual amendment” on 4/30/2025 which was published after our last “annual amendment” filed on 3/18/2025.

A complete description of these changes can be found in the corresponding sections of this brochure.

### **#1 Form ADV Part 2A, Item 4 – Advisory Business:**

New disclosures added regarding our use of artificial intelligence (AI) in two distinct ways:

- **ADVYZE Equity Research Tool:** We are using an internally built equity research software system called ADVYZE which has AI-assisted features. It is a proprietary tool used exclusively by our advisors to support our Traditional Asset Management and Asset Management Consulting services. ADVYZE is not a service offered to clients.
- **AI Consulting:** We now offer a separate, fee-based AI Consulting service. This service includes advice and guidance on technology adoption such as AI. This is a distinct service with billable hourly labor.

### **#2 Form ADV Part 2A, Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss:**

**ADVYZE Equity Research Tool & Artificial Intelligence (AI) Workflows:** ADVYZE is a proprietary, internally developed, AI-assisted equity research tool designed to help our advisors analyze public and third-party data more efficiently and dynamically. The most specialized technique uses a knowledge graph-based retrieval augmented generation (RAG) design for database querying. It is currently limited to a focused group of stocks. Separate analytical features are applicable to a larger group of stocks and have the capability to produce investment recommendation reports.

AI tools do not access client data or make final decisions. A human advisor always reviews the outputs and makes all final investment recommendations and trades based on a client's specific needs and suitability. The firm acknowledges that ADVYZE, like any technology, carries risks, including potential data quality issues, model bias, and more. There are also potential conflicts of interest which led the firm to put safeguards in place, such as more restrictive internal trading policies and a commitment to improve evaluation techniques for ingested data and output responses.

**Asset Management Consulting:** Our methods of analysis and strategy are described in more detail for each specific service. The most material new disclosures include:

- **AI Consulting and Development:** We provide advisory and development resources for clients seeking to leverage artificial intelligence. Our methods include strategic advisory on the application of AI, custom AI tool development, and guidance on data pipeline and integration. Advice and development are informed by our resources and knowledge, not by a license to use internal technology.
- **Real Estate:** Consulting on potential investments such as real estate rentals or individual securities is a service provided on a per hour basis. We do not manage physical assets acquired by clients. Advisory is exclusively with owners and investors and others seeking advice on the real

estate industry. The firm does not represent other individuals or entities. We do not operate, manage, rent, offer, or attempt to operate, manage, or rent any building or options of buildings to the public as tenants. We do not represent others in property management, leasing, negotiating, financial operations, marketing, or transacting real estate

**#3 Form ADV Part 2A, Item 11 – Code of Ethics:**

The firm has implemented a specific policy regarding the ADVYZE system. Since the platform can generate real-time investment recommendations, there is a potential for our supervised persons to gain advanced knowledge of these recommendations. To address this potential for conflict of interest, particularly front-running, our Code of Ethics prohibits all supervised persons from engaging in proprietary trading based on an ADVYZE-generated recommendation before a client has had the opportunity to act on it.

**#4 Form ADV Part 2A, Item 13 – Review of Accounts:**

The ADVYZE system can generate investment recommendations that may prompt an advisor to conduct a more detailed review of a client's specific holdings. However, the system does not automatically trigger a review or decide on the suitability of any holding for a client. The ultimate responsibility for reviewing and making recommendations on a client's portfolio remains with the human advisor.

**#5 Form ADV Part 2A, Item 19 – Requirements for State-Registered Advisers,**

**#6 Form ADV Part 2B, Item 2 – Educational Background and Business Experience &**

**#7 Form ADV Part 2B, Item 4 - Other Business Activities:**

Removed mcp.ninja LLC and Precision Studio LLC Principal following dissolution of the Ohio entities. The experience as principal was removed due to the short duration and non-operational status of these entities. No compensation was received from these activities and there are no further material disclosures to provide.

### **Item 3 - Table of Contents**

#### **Form ADV Part 2A - Firm Brochure**

<b>Item 1</b>	<b>Cover Page.....</b>	<b>1</b>
<b>Item 2</b>	<b>Material Changes.....</b>	<b>2</b>
<b>Item 3</b>	<b>Table of Contents.....</b>	<b>4</b>
<b>Item 4</b>	<b>Advisory Business.....</b>	<b>5</b>
<b>Item 5</b>	<b>Fees and Compensation.....</b>	<b>6</b>
<b>Item 6</b>	<b>Performance-Based Fees and Side-By-Side Management.....</b>	<b>8</b>
<b>Item 7</b>	<b>Types of Clients.....</b>	<b>8</b>
<b>Item 8</b>	<b>Methods of Analysis, Investment Strategies and Risk of Loss.....</b>	<b>8</b>
<b>Item 9</b>	<b>Disciplinary Information.....</b>	<b>15</b>
<b>Item 10</b>	<b>Other Financial Industry Activities and Affiliations.....</b>	<b>15</b>
<b>Item 11</b>	<b>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</b>	<b>15</b>
<b>Item 12</b>	<b>Brokerage Practices.....</b>	<b>16</b>
<b>Item 13</b>	<b>Review of Accounts.....</b>	<b>18</b>
<b>Item 14</b>	<b>Client Referrals and Other Compensation.....</b>	<b>18</b>
<b>Item 15</b>	<b>Custody.....</b>	<b>18</b>
<b>Item 16</b>	<b>Investment Discretion.....</b>	<b>19</b>
<b>Item 17</b>	<b>Voting Client Securities.....</b>	<b>19</b>
<b>Item 18</b>	<b>Financial Information.....</b>	<b>19</b>
<b>Item 19</b>	<b>Requirements for State-Registered Advisers.....</b>	<b>20</b>

#### **Form ADV Part 2B - Brochure Supplement**

<b>Item 1</b>	<b>Cover Page.....</b>	<b>21</b>
<b>Item 2</b>	<b>Educational Background and Business Experience.....</b>	<b>22</b>
<b>Item 3</b>	<b>Disciplinary Information.....</b>	<b>22</b>
<b>Item 4</b>	<b>Other Business Activities.....</b>	<b>22</b>
<b>Item 5</b>	<b>Additional Compensation.....</b>	<b>22</b>
<b>Item 6</b>	<b>Supervision.....</b>	<b>23</b>
<b>Item 7</b>	<b>Requirements for State-Registered Advisers.....</b>	<b>23</b>

## **Item 4 – Advisory Business**

### **Description of Firm**

Deem Asset Management, LLC (herein referred to as “the firm”, “we”, or “us”) is based in Uniontown, Ohio and also operates in North Canton, Ohio. The firm is an Ohio LLC founded by Anthony J. Deem, President and Chief Compliance Officer (“CCO”). It became registered in 2022. The firm is located at 2492 Country Club Dr., Uniontown, Ohio 44685. The firm provides asset management advisory services for portfolios of securities and other asset consulting services to its clients.

### **Ownership**

Anthony J. Deem is the only member of Deem Asset Management, LLC. He is responsible for day-to-day operations including client engagement, compliance, marketing, portfolio management, consulting, securities research, information technology, accounting, administration, and more.

### **Types of Advisory Services Offered**

The firm provides fee-based investment advisory services and manages portfolios of securities and assets such as stocks, derivatives, mutual funds, Exchange Traded Funds or ETF’s, fixed income securities, and more. Additionally, we offer asset management consulting services for held-away accounts, personal financial planning, and other services such as real estate rental analysis and AI-related technology initiatives. We do not maintain custody of client funds or securities. There is no minimum investment required for any of our services. There is no lock-up period for client funds and investments. We do not offer a wrap fee program. All clients are required to agree to terms outlined in an advisory agreement.

**Traditional Asset Management Services (“Traditional”):** We service individual accounts that allow limited discretionary authority to invest client funds across a spectrum of suitable investments. Clients will have separate service agreements with Charles Schwab, who will act as broker-dealer and custodian. Item 5 – Fees and Compensation provides greater detail on fees and expenses. Individual goals, risk tolerance, suitability, and strategy are determined in a profile for each client. Profiles include an investment strategy statement. Written authorization in client agreements provides the firm with limited discretionary authority over client accounts to trade in securities.

**Asset Management Consulting:** The firm offers several consulting services and is compensated through billable hourly labor. We offer the following services:

- **Fee Advice:** A service for clients who wish to have a portfolio of investments managed separate from our firm. Services include the following: 1) Professional Security Analysis; 2) Personal Financial Planning; 3) Estate Planning; 4) Retirement Planning; 5) Investment Portfolio Weighting and Rebalancing Review; 6) Private Business Analysis; 7) Industry Analysis; 8) Valuation Analysis; 9) Real Estate Investment Analysis; 10) General Asset Analysis; 11) Other Forms of Tailored Financial Planning or Advisory Services.
  - **Personal Financial Planning Services:** Clients receive financial planning data, projections and a document which reviews focus areas, asset locations, net worth projections, goals, and action items.
- **AI Consulting:** The firm provides advisory and development resources for clients seeking to leverage artificial intelligence (AI). This includes:
  - **Strategic Advisory:** Consulting on the application of AI in investment research, wealth management or other industries.
  - **Custom AI Tool Development:** Assisting a team with the implementation of AI tools for industry research, or other custom applications.

- **Data Pipeline and Integration:** Advising on and developing data pipelines to feed financial and market data into databases for AI usage.
- **Public Speaking Engagements:** A fee generated by a representative of the firm speaking publicly about a topic. The fee includes time committed to preparation, delivery, and follow-up activity.
- **Content Creation:** A fee generated by a representative of the firm for writing articles or other types of content for a client. The fee includes time committed to content creation, including research and a time log for the writing process.

The firm customizes advisory services to the individual needs of clients. Clients may impose restrictions on certain securities or types of securities. Client portfolios are managed on a limited discretionary basis in accordance with pre-determined investment objectives or needs requiring customized asset allocation weightings aligned with individual risk tolerance and suitability. Most clients are required to complete an initial application which provides the firm with personal financial information such as income, assets, liabilities, net worth, risk tolerance, investing experience and other relevant personal financial information. Exceptions to this application requirement may be granted if it is determined an individual is an accredited or sophisticated investor. Clients are expected to communicate any changes in risk tolerance or investment objectives prior to any periodic review sessions.

The firm utilizes an internally developed AI-assisted equity research technology named ADVYZE to support securities analysis and other needs in Traditional Asset Management and Asset Management Consulting services. ADVYZE is not a separate service of the firm. Intellectual property at ADVYZE may be used to inform clients. However, the service is a transfer of knowledge and experience, not a license. More details on ADVYZE can be found in Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss.

As of August 25, 2025, Deem Asset Management managed \$10,942,911 in assets on a discretionary basis and \$0.00 on a non-discretionary basis. Total asset values include accrued income.

### **Item 5 – Fees and Compensation**

**Portfolio Management Services:** The firm has a single rate qualified tier approach to payment which applies a percentage across the whole value of the account, irrespective of asset types held. With written authorization from a client, fees will be deducted by a custodian during the first calendar or business day of each quarterly period before market open. Base fees will be calculated on a pro-rated basis dependent upon timing of capital inflows and outflows. Clients may not pay fees in advance based on any estimates. Fees are negotiable. Quarterly statements are available, and clients should verify accuracy of fee calculations when reviewing statements.

The firm intends to use safeguards in the State of Maine for residents with fees directly deducted from accounts. Clients may waive their right to an itemized invoice each quarter. The waiver in Maine must describe the right being waived and must be on a document that does not address any other matter. Otherwise, itemization of the fee must be sent each quarter which includes the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee. Other states where the firm operates under de minimis exceptions often do not provide the right to waive an itemized invoice.

The firm and its representatives are compensated from charging a percentage of the value of assets under management (AUM).

- **Traditional Asset Management:** Base fees are calculated at an annualized rate of 1.5% of total account assets, unless negotiated otherwise.

**Asset Management Consulting Service:** The firm charges \$125 an hour for consulting services after an initial consultation. The fee represents direct compensation for an investment advisor representative at the Firm. This rate is non-negotiable and will not change unless a client agrees to such modification. Clients should recognize comparable services from other advisory firms could be provided at a lower cost.

- Clients may pre-pay an estimate of no more than \$500 for a consulting contract 6 months in advance and can obtain a refund of the fee within 60 days after contract termination. The amount of the refund is calculated as total fees pre-paid minus billable hourly charges from completed contract advisory work assessed by a firm representative. Invoices are provided to clients monthly for advisory fees incurred.

**Additional Disclosure on Fees and Compensation:** The firm is not a broker-dealer nor is it compensated for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds, or any other transactional activity at Charles Schwab or with any other broker-dealer or custodian. Therefore, we do not see specific asset allocation options, broker-dealer, or custodian choice as potential areas where conflicts of interest may arise in relation to incentive to recommend investment products based on compensation potential.

Clients have the option to purchase investment products that the firm recommends through other brokers or agents that are not affiliated. Each investor has their own account on Charles Schwab. Management of client capital is not taking custody of assets. Client investments and funds are always accessible to liquidate and withdrawal from Deem Asset Management accounts.

Multiple accounts at one household may request consolidated account reporting if it's the same mailing address, unless explicitly stated as not eligible in the advisory agreement.

Clients will pay separate fund fees, fund expenses, brokerage commissions, custodian costs and other transaction related fees directly to Charles Schwab or other broker-dealer or custodians. For example, a client invested in a mutual fund, index fund or ETF might be charged separately by the fund for management fees associated with the fund's operating expenses, which can be found in the fund's prospectus.

Charles Schwab broker-dealer commissions and fees incurred in most stock-based transactions are typically \$0.00 or are otherwise inexpensive for exchange-listed securities. Clients should note the buying and selling of certain securities or derivatives such as U.S. OTC listed securities, Canadian stock transactions, or options, if applicable, may carry a higher transaction cost typically through a commission from the broker-dealer to our clients. Other non-advisory fees clients may experience include margin loan interest and stock borrow fees, per bond transaction fees on secondary market trades in fixed income, and electronic fund transfer fees.

Additional information on these fees can be found in client agreements and/or separate service agreements with these providers.

Initial consultation is free for all clients for all services provided. Clients will agree to their agreement, profile and strategy statement based on suitability and risk assessment prior to allocating capital. More information on strategy and risk can be found in Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.

The firm does not charge administrative or custodian fees. Included in our fee-based services are time and expenses incurred on planning, communicating, implementing, and maintaining a client's investment strategy. The firm reserves the right to recommend a consulting agreement, renegotiate fees or deny ad-hoc requests. For example, a client may want to buy a stock or other security but seeks time-consuming, in-depth research to explore the merits of allocation. This may result in an hourly service charge if a client agrees to the work and signs an Asset Management Consulting agreement.

Clients for Asset Management Consulting and those who may direct brokerage to non-Charles Schwab broker-dealers with custody will be directly billed for advisory fees.

#### **Item 6 - Performance-Based Fees and Side-By-Side Management**

The firm and its representatives do not seek to be compensated by a performance-based fee, which is a fee collected based on a share of capital gains on or total appreciation of assets. This form of compensation has applied to our services in the past. Our Qualified Asset Management service was discontinued in February 2024.

Ohio Administrative Code prohibits the Firm from receiving any type of advisory fee calculated as a percentage of capital gains or appreciation in the client's account. This prohibition extends to contingent fee arrangements, including contracts that provide for the fee to be waived or reduced if certain performance levels are not met. This prohibition does not apply to certain clients such as those who verified having at least \$1.1 million under the management at the Firm, or if the client has a net worth of more than \$2.2 million excluding the value of the client's personal residence.

#### **Item 7 - Types of Clients**

The firm may provide services for individuals, high net worth individuals, small businesses, corporations, profit sharing plans, foundations, charities, other non-profits, institutional investors, pension plans, other institutions/funds, other businesses, trusts, estate accounts and retirement plans.

The firm does not have a minimum account size.

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

The firm provides investment recommendations and transacts in various asset classes for clients after evaluation of client risk tolerance and suitability. As a result, methods of analysis, investment strategy and risk exposure vary from client to client due to suitability differences.

Client securities transactions are exclusive with Charles Schwab unless brokerage is directed by the client. Trading and other transactional activity will cause clients to incur fees or expenses outside of advisory fees from our firm.

Investing in securities carries a risk of losses that clients should be prepared to bear. Clients should understand the risks and volatility associated in each market they invest in. Assets under management at the firm could result in greater volatility versus underlying markets.

- **Stocks, Mutual Funds, ETFs, Other**
  - Method of analysis and strategy:
    - The firm will implement or make changes in a portfolio to optimally weight client risk tolerance and investment objectives. We may buy or sell securities because of market volatility, individual security valuation, profit and cash flow forecasts, dividend payout potential, growth vs. value analysis, sector rotation

timing, client tax strategy, or to rebalance risk exposure in asset classes. Insights from the ADVYZE platform may also influence our recommendations and trading actions as further described below.

- We may hedge suitable portfolios that are long, i.e. investment value grows when prices appreciate, with put options, ETF's or shorting of individual stocks. We may also sell securities or temporarily recommend hedging a portfolio by moving into cash in downward markets.
- For mutual funds, we will evaluate historical performance, portfolio managers, fees, and other criteria as necessary.
- Accounts with frequent trading can experience a negative impact in net investment return performance through greater brokerage and transactions expenses, as well as higher taxes. Traditional Asset Management client accounts may see frequent trading depending on portfolio factors and suitability.
- Material risks involved:
  - There are no guarantees of income or capital appreciation when you buy securities such as stock in a company or an ETF. Securities can lose some or all their value. Mutual funds can lose some or all value as securities held by a fund can lose value. Dividends or interest payments are also subject to change based on market conditions that can negatively impact investment performance.
- **ADVYZE Equity Research Tool & Artificial Intelligence (AI) Workflows**
  - Method of analysis and strategy:
    - **ADVYZE and AI workflow overview:** ADVYZE is an internally developed, AI-assisted equity research system intended to enhance the workflow of our firm's equity and industry research efforts. ADVYZE's most specialized technique involves custom querying capabilities which helps to supply relevant and contextual financial insights on a limited, but growing, number of stocks and industries. Other features, sometimes deployed via AI "agents," can be used to generate analytical insights, including buy/sell/hold recommendations, for most U.S.-traded stocks. Overall, ADVYZE gives us the opportunity to collect, store, ingest and analyze data from financial sources such as SEC filings and earnings call transcripts.
    - **Specialized techniques:** ADVYZE uses a graph-based retrieval-augmented generation (RAG) system. In practical terms, it improves the reliability and traceability of AI-generated content by providing models with structured context and clear attribution for response claims, though it doesn't eliminate hallucinations entirely (i.e. text that is inaccurate or not grounded in reality).
    - Graph RAG is an emerging technique in the AI community designed to reduce large language model (LLM) hallucination risk. It also helps to enhance data provenance by retrieving structured, verified data sources from the database before generating responses. Our graph RAG system ingests public and subscription-based financial data into a database designed with unique ontology layers (universal → industry → company) which generate custom nodes and explicit relationship types to help improve performance of query responses.
    - **Role and limitations:** We believe ADVYZE has a material impact to our equity research capabilities. While it influences advisor analysis, it is not a robo-advisor

and does not tailor outputs to individual client circumstances. Key safeguards include:

- Outputs are reviewed by personnel and supplemented with additional research before any final recommendation or trade
- Data validation controls are in place, with ongoing work to improve evaluation techniques and quality metrics
- Advisors continue to rely on traditional research methods alongside AI workflows.
- The firm is committed to enhancing the underlying methodology to ensure proper human oversight and validation
- **Material risks involved:**
  - The use of artificial intelligence (AI) for equity research and financial planning intelligence gathering carries risks, including but not limited to:
  - **Performance:** We do not represent ADVYZE as the sole basis for investment decisions, nor do we claim superior performance from the use of proprietary or non-proprietary AI software. AI does not alter the fundamental risks inherent in securities investing, including the risk of loss.
  - **Model bias and misinterpretation:** AI generated insights can be confidently wrong. Models can exhibit historical bias or misinterpret source material, which leads to flawed analysis. For instance, the system might identify patterns that appear statistically significant but lack causal validity.
  - **ADVYZE platform objectivity:** ADVYZE's design is intended to enhance depth and objectivity in investment research through systematic analysis. The platform's algorithms are not designed to exhibit subjective bias, yet clients should understand that algorithmic approaches and AI usage may still contain inherent biases based on underlying data sources, model parameters, and code design.
  - **Technology and vendor risks:** Outages, LLM hallucinations, integration issues, cybersecurity issues, or vendor dependencies could negatively affect availability or outputs.
  - **Client outcome misalignment:** AI tools do not incorporate individual client suitability, objectives or risk tolerance. Advisors incorporate client-specific factors before any recommendation or trade outside of AI usage.
  - **Data and app quality:** The systems we use depend on third-party and public sources which may be inaccurate or incomplete. We aim to mitigate this risk with validation layers and a reliance on credible data sources. Residual risk remains as the ADVYZE application may not be considered enterprise grade or quality given the firm's limited technical resources. When inconsistencies are identified, additional human review follows.
  - **Limited evaluation & technical standards:** ADVYZE is deployed locally and is not managed at an enterprise production level. ADVYZE's data quality standards and input-output evaluation techniques must be improved to support an increasingly reliable research system capable of scaling into a higher quality enterprise grade application. Further, ADVYZE may eventually necessitate more robust technical standards for certification, performance, safety, security and interoperability, which have not been applied at this time as the application will

run in a local environment on isolated hardware for the foreseeable future. More advanced and reliable evaluation methods for output accuracy, bias and overall performance are under development. Additionally, efforts towards a more comprehensive AI governance framework are underway as the firm seeks to implement responsible AI standards, cybersecurity policy updates, validation and testing, and employee policy updates to ensure effective and compliant utilization of ADVYZE and other AI tools. These initiatives are designed to mature technical standards and operational controls over time as ADVYZE capabilities are likely to change.

- **Investment recommendation generation:** Certain ADVYZE features can generate equity investment recommendations in a report. All reports are produced in real-time during research due diligence rather than being pre-generated or distributed according to predetermined schedules. While this on-demand report generation process prevents systematic advance notice of recommendation changes, advisors still have access to recommendations before clients or other readers receive them. The firm recognizes that advance knowledge of investment recommendations could create potential conflicts of interest if used for proprietary trading ahead of client access. To address this risk, the firm has updated internal policies to put restrictions on personal trading that could benefit from advance knowledge of ADVYZE recommendations. Clients may request a copy of our Trading Policy and Code of Ethics for further disclosure.
- **Potential conflicts:** We have identified several potential risks related to conflicts of interest. These include but may not be limited to:
  - ADVYZE research insights may overlap with securities held in client accounts or personnel accounts. Given that individual client profiles are not provided to ADVYZE, stock research outputs do not align with any client's specific objectives or risk tolerance. Therefore, an advisor may trade insights differently across accounts. The firm receives no compensation for security selection or additional analysis and aims for suitable treatment across client accounts, regardless of technologies or methods used.
  - ADVYZE is used internally for financial research and to inform the advice provided to consulting clients.
    - **Firm's Interests vs. Client's Interests:** Our firm has a financial incentive to market and sell all our services, which could influence the depth of securities research or other advice we provide to different clients. Asset Management Consulting advice is based on a separate and pre-agreed-upon scope of work, which is not tied to investment performance
    - **Use of Proprietary Technology:** The firm may use its proprietary intellectual property, including knowledge and experience gained from the ADVYZE platform, to inform the consulting advice provided to clients. Clients should understand that the firm maintains control over the platform and its intellectual property, which may limit the specific details provided to clients.

- **Trading frequency cost:** There is risk of greater trading frequency with ADVYZE as it is a resource which seeks to conduct securities analysis more efficiently. The risk of more trading from AI insights has potential to lead to higher costs such as transaction expenses from the broker-dealer, taxes or capital losses.
- **Additional disclosures and FAQs:**
  - **Accuracy and anti-fraud compliance:** Disclosures are intended to be transparent and consistent with actual usage and capabilities of AI and the ADVYZE platform at our firm. Given rapid industry changes in the AI and financial technology sectors, we will monitor and update our website, firm brochure, and/or related materials as needed.
  - **Data handling and privacy:** ADVYZE does not collect or access client data, including profiles, account information or personally identifiable information (PII). ADVYZE is not a financial planning tool that provides individualized advice. The firm does use large language models for discrete and de-identified analytical tasks for planning purposes.
  - **Trading, Fees:** ADVYZE is not connected to any broker-dealer or custodian. Final investment recommendations and trades are made by a human advisor who considers each client's objectives, risk tolerance, and overall portfolio context. ADVYZE and the usage of AI does not change our advisory fee structure. We do not receive compensation from issuers, brokers, or other third parties for securities recommendations or ratings.
  - For more information, visit our website at [www.deemasset.com/advyze](http://www.deemasset.com/advyze). Clients may also contact the firm's President and Chief Compliance Officer at [a@deemasset.com](mailto:a@deemasset.com) to discuss benefits, limitations, controls, or other topics of interest related to our usage of technology.
- **Fixed Income:**
  - Method of analysis and strategy:
    - Clients can invest in bonds, bond funds and ETFs, CDs, and preferred securities. Strategies will vary by client based on needs related to preferential tax advantages, income dependability and predictability, a need to smooth out investment returns, savings and retirement goals, capital preservation, and portfolio diversification.
    - We may employ ladder strategies for clients who want to secure predictable income of bonds with flexibility to reinvest if rates go up.
    - We may employ a barbell strategy to divide the allocation of bonds between short and intermediate term maturities to maximize the benefits of each, i.e. long-term provides income, short-term provides liquidity to reinvest.
  - Material risks involved:
    - The market value of fixed income securities and bonds can decline. We believe the primary risks involved in fixed income investing include interest, credit, inflation and call risk. More information on these risks can be found at <https://www.schwab.com/bonds/faqs>
- **Cryptocurrencies / Crypto Assets:**

- Method of analysis and strategy
  - The firm may not engage in advisory, consulting or effecting transactions in crypto assets outside of registered securities. A change to this strategy is dependent on regulatory clarity from the SEC, Ohio or Maine.
  - Exposure to the mainstream crypto markets is typically gained through an account such as Coinbase. After an internal review, these exchanges are found to be trading securities that are unregistered and non-exempt, which is a prohibited activity at our firm. To avoid future unfavorable enforcement action potentially retroactive in nature, clients may only gain exposure to crypto assets through registered securities such as a Bitcoin ETF.
  - The firm evaluates investing in crypto assets based on liquidity, momentum and popularity in marketplace, software project viability and potential, software development milestone visibility and achievement as well as general market timing factors.
  - Our policy is to follow equivalent prudence and care in crypto asset investment in relation to rules and regulations associated with traditional securities investing, or otherwise as instructed by regulatory bodies. As a result, crypto asset investment strategies are developed after a client suitability review, like all other advisory services.
  - Changes in a portfolio are driven by rules to optimally weight client risk tolerance and investment objectives. Crypto asset exposure is only suitable for certain investors in higher risk tolerance tiers, or as determined suitable by the CCO. This is considered during initial consultation and on an ongoing basis through account reviews in pursuit of optimal client investment mix.
  - We abide by the same fiduciary standard and code of ethics for clients investing in cryptocurrency assets as it does in all other traditional securities.
- Material risks involved:
  - Crypto asset investing carries both significant and unusual risk versus traditional securities. The crypto market operates 24/7 and is more volatile in relation to other types of securities and asset classes. Valuation metrics are undeveloped making asset fair value evaluation highly challenging due to the lack of cash flow and earnings forecasts. Crypto assets have a greater chance of fraud, theft, and cybercrime. Crypto is a nascent industry and fundamentals are misunderstood by the investing public and many finance professionals.
  - Customer service levels for crypto exchanges and crypto custodians is inferior when compared to established broker-dealers with custody such as Charles Schwab.
  - Markets in crypto are also often less liquid versus other asset classes such as stocks or bonds. This is particularly true for obscure coins. If our firm begins advising and effecting transactions in the future for crypto assets, the unique nature of these risks will necessitate us to educate investors and provide market updates, which will be accompanied by appropriate risk disclosures.
  - A digital wallet is utilized for crypto transactions. Crypto assets are not protected by the FDIC or SIPC. Large exchanges often have digital asset insurance, in addition to having capital reserve requirements. Custody and verifiable proper storage of crypto assets is made possible through the exchanges acting with custody.

- There are greater uncertainties and added layers of risk with respect to crypto industry asset custody and security. In the event of an account breach, exchanges often temporarily suspend withdrawals until a thorough security review is complete. This also creates liquidity risk for investors should a breach occur. Investors seeking maximum security of their crypto assets may have to make a trade-off by considering a cold storage method versus hot storage, or a hybrid between the two.
- **Asset Management Consulting**
  - **Method of Analysis and Strategy:** The firm offers a range of consulting services on a billable hourly basis. Our methods of analysis and strategy are tailored to each specific service:
    - **Fee Advice:** For this service, we provide professional analysis and guidance on client-specific situations. This includes security analysis, personal financial planning, estate and retirement planning, and reviews of investment portfolios. Our analysis is based on traditional financial planning and investment principles.
    - **AI Consulting and Development:** We provide advisory and development resources for clients seeking to leverage artificial intelligence, particularly for company and industry research needs. Our methods include strategic advisory on the application of AI, custom AI tool development planning, and resources for workflow integration. Advice and development are informed by our internal resources and knowledge, not by a license to use ADVYZE technology.
    - **Real Estate:** Consulting on potential investments such as real estate rentals or individual securities is a service provided on a per hour basis. We do not manage physical assets acquired by clients. Advisory is exclusively with owners and investors and others seeking advice on the real estate industry. The firm does not represent other individuals or entities. As such, we do not operate, manage, rent, offer, or attempt to operate, manage, or rent any building or options of buildings to the public as tenants. We do not represent others in property management, leasing, negotiating, financial operations, marketing, or transacting real estate.
    - **Public Speaking Engagements and Content Creation:** These services are based on the knowledge of our firm's representatives. Content is created and topics are presented based on professional experience.
  - **Material Risks Involved:**
    - **No Capital Loss Risk on Fees:** There is no risk of capital loss in our Asset Management Consulting services, as compensation is a billable hourly fee.
    - **Investment-Related Risks:** For services related to investment advice, our analysis and recommendations could potentially inform an investment decision that may result in a loss of value.
    - **AI-Specific Risks:** Our AI Consulting services are based on rapidly evolving technology. The effectiveness of any AI tools or strategies developed may be subject to various risks, including but not limited to, data quality issues, model bias, and limitations in the underlying technology.
    - **Conflict of Interest:** See disclosures in the above risk section within “ADVYZE Equity Research Tool & Artificial Intelligence (AI) Workflows”.
    - **No Guarantee of Outcome:** The advice provided in our consulting services is for informational and educational purposes and does not guarantee a specific

outcome or result. All investment-related advice should be considered alongside the fundamental risks of securities investing, including the risk of loss.

### **Item 9 -Disciplinary Information**

The firm and its representatives are required to disclose all material facts regarding events deemed material to the evaluation of the integrity of the team of individuals managing assets.

The firm and its representatives do not have any information to provide to clients or prospects as it relates to the following:

- Disciplinary action from the SEC or any other federal or state regulatory agency.
- Criminal or civil action in a domestic, foreign or military court of competent jurisdiction.
- An administrative proceeding before the SEC, any other federal or state regulatory agency, or any foreign financial regulatory authority.
- A self-regulatory organization proceeding.

### **Item 10- Other Financial Industry Activities and Affiliations**

Firm representatives are not registered with any broker-dealer.

The firm and its representatives do not select other investment advisers for clients.

The firm and its representatives do not have insurance affiliations.

### **Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

The Firm will provide a copy of its code of ethics to any client or prospective client upon request.

The goal of our code of ethics is to allow all persons to engage in personal securities transactions while protecting advisory clients, the Firm, and its employees or affiliates from conflicts in relation to violation of federal securities laws or from conflicts of interest. The code of ethics sets forth standards of conduct and requires compliance with federal securities laws. It also addresses personal securities trading of all representatives requiring the reporting of personal securities holdings and transactions, including those in affiliated mutual funds.

From time to time, a Firm representative may recommend a security, or other type of investment recommendation which the individual or related person has a material financial interest. As this is a potential conflict of interest, all representatives are encouraged to be transparent with clients and are required to provide personal securities holding information verbally or in writing to a client who requests this information.

All representatives except the CCO require verbal or written pre-approval from the CCO when investing personal capital in securities that are of material financial interest when the securities are currently held by a client or when timing for a client investment is planned in conjunction with a personal investment.

Our code of ethics outlines our policies on personal securities trading to prevent conflicts of interest, including the misuse of material nonpublic information and front-running. As part of this, the firm has implemented a specific policy regarding our proprietary ADVYZE system. Since the ADVYZE platform can generate real-time investment recommendations, there is a potential for our supervised persons to gain advance knowledge of these recommendations. To address this potential for conflict of interest, particularly front-running, our Code of Ethics prohibits all supervised persons from engaging in proprietary trading based on an ADVYZE-generated recommendation before a client has had the

opportunity to act on it. This policy, along with other personal trading restrictions, is designed to ensure fair and equitable treatment for all clients.

### **Item 12 - Brokerage Practices**

The firm seeks to use a custodian/broker that will hold client assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. Our custodial agreements with Charles Schwab meet our requirements where we consider a wide range of factors, including: Combination of transaction execution services and asset custody services (generally without a separate fee for custody), Capability to execute, clear, and settle trades (buy and sell securities for a client account), Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.), Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.), Availability of investment research and tools that assist us in making investment decisions, Quality of services, Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices, Reputation, financial strength, security and stability, Prior service to us on a personal level.

Broker-dealer and custodial agreements are requested to be executed through Charles Schwab. We do not routinely recommend, request, or require that a client directs the firm to execute transactions through a specified broker-dealer. However, we will allow clients to direct brokerage which must go through an approval process with our CCO. Directing brokerage may achieve less favorable execution, transaction price, higher fees, or expenses versus the established Schwab relationship. For example, a different broker-dealer might charge a commission on a trade that Schwab would not charge for.

We do not solicit or request other broker-dealers or custodians outside of Schwab.

There is no economic relationship Charles Schwab has with our firm. There is no direct compensation due to client transaction activity as client trading or holding related expenses such as commissions or fees are paid directly to Charles Schwab, a fund, or elsewhere as disclosed to the client.

For client accounts that Schwab maintains, Schwab generally does not charge clients separately for custody services but is compensated by charging commissions or other fees on trades that it executes or that settle into a Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in a client account in Schwab's Cash Features Program. For some accounts, Schwab may charge a percentage of the dollar amount of assets in the account in lieu of commissions.

We have determined that having Schwab execute most trades is consistent with a duty to seek "best execution" of client trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like ours. They provide clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we do have to request them) and at no charge.

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a

significantly higher minimum initial investment by clients. Schwab's services described in this paragraph generally benefit a client and their account.

Schwab also makes available to our firm other products and services that benefits us directly but might not directly benefit clients. These products and services assist us in managing and administering clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that: Provide access to client account data (such as duplicate trade confirmations and account statements), Facilitate trade execution and allocate aggregated trade orders for multiple client accounts, Provide pricing and other market data, Facilitate payment of our fees from our clients' accounts, Assist with back-office functions, recordkeeping, and client reporting

Schwab also offers other services intended to help us manage and further develop our business. These services include: Educational conferences and events, consulting on technology, compliance, legal, and business needs, Publications and conferences on practice management and business succession, Access to employee benefits providers, human capital consultants, and insurance providers, Marketing consulting and support Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of personnel.

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. This creates an incentive to require that clients maintain an account with Schwab, based on our interest in receiving Schwab's services that benefit the business and Schwab's payment for services for which we would otherwise have to pay rather than based on client interest in receiving the best value in custody services and the most favorable execution of client transactions. This is a potential conflict of interest. We believe selection of Schwab as custodian and broker is in the best interests of clients. The selection is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us.

Clients give us authority to trade securities and assets with broker-dealers with custody once a Traditional Asset Management agreement is signed in full by the client and the investment advisor representative.

Research and Other Soft Dollar Benefits: We do not receive research or other products or services from broker-dealers because of client activity. We do not use soft dollar benefits to pay for a specific service level within accounts.

Brokerage for Client Referrals: We do not receive client referrals due to a client relationship with a broker-dealer. We do not consider this as material in requiring a broker-dealer relationship.

The Firm primarily invests in liquid securities and investments for its clients making the influence of underlying prices low. Block orders are allocated among clients when consolidated order opportunities are presented to us by several different accounts. Conditions for this may be related to an attempt to take advantage of lower commissions or to obtain a favorable price. The costs of not aggregating these securities transactions could be material. All account allocations are predicated on fair client price execution in terms of participation in the trade and value allocation across various client accounts. Liquidity issues could occur, and broker execution could be limited, thus leading to orders filled over

multiple days at various prices. Average prices are determined once all orders are filled. We will equitably finalize and allocate orders in alignment with broker-dealer ability and client advisory agreements.

### **Item 13 - Review of Accounts**

The firm periodically reviews client accounts and financial plans in Traditional Asset Management services. Anthony J. Deem, President and CCO, conducts general internal reviews at least quarterly for each account. The Firm is required to review and document suitability and recommendations no less than one time in a three (3) year period or more frequently if the client has specific needs or circumstances that warrant such a review. More frequent review may be triggered by inflows and outflows of capital, client requests, a change in market or economic conditions, rebalancing need, or following routine client risk assessments and objective reviews. Clients receive written account statements from custodians no less than once every quarter. Statements include account activities and balances during the period.

Advisors may use outputs from the ADVYZE system or other AI tools as an aid to inform clients. More details on ADVYZE can be found in Item 8 of this brochure. The ADVYZE system can generate investment recommendations that may prompt an advisor to conduct a more detailed review of a client's specific holdings. However, the system does not automatically trigger a review or decide on the suitability of any holding for a client. The ultimate responsibility for reviewing and making recommendations on a client's portfolio remains with the human advisor, who considers all relevant factors, including the client's individual circumstances, before taking any action.

### **Item 14 - Client Referrals and Other Compensation**

The firm does not have economic benefits arrangements that generate income.

The firm actively seeks third party solicitor arrangements in Ohio that generate income. The firm does not seek these agreements in Maine. The firm will have these agreements in place with entities and individuals that provide client referrals in exchange for a fee. This is potentially a conflict of interest. Before any fees are paid to a solicitor in exchange for a referral, they will enter into an agreement requiring delivery of a disclosure to the prospective client which details the arrangement. Solicitors must be in full compliance with all mandates required by the State of Ohio and to be in good standing as a Solicitor as outlined in Ohio Revised Code.

The firm receives an economic benefit from Charles Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. In addition, Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Schwab reaches a certain amount. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

### **Item 15 - Custody**

Charles Schwab maintains actual custody of client assets. Clients will receive account statements directly from Schwab at least quarterly.

The firm is authorized to debit advisory fees directly from client accounts in accordance with client advisory agreements and in compliance with applicable custody rules and regulations. By statute, the firm has a form of custody given this ability to deduct advisory fees from client accounts as instructed to the

custodian to remit payment. Otherwise, the firm does not have direct custody of client funds, securities, or any other assets.

Account statements are sent at least quarterly from Charles Schwab to the postal mailing address or email. Statements include all transactional activity, inflows, outflows, non-advisory fees and expenses, and advisory fee deductions. Clients should carefully review these statements and compare Schwab with the Firm's portfolio reporting. Additional information related to account activity or supplemental information may be reported to clients directly from our firm. Clients are encouraged to contact Anthony J. Deem (CCO) at (330) 685-1975 or a@deemasset.com with any discrepancies.

#### **Item 16 - Investment Discretion**

The firm manages all securities and asset portfolios with limited discretionary authority which means without obtaining prior approval clients authorize us to buy or sell securities in their accounts, select specific amounts, and recommend and select a broker-dealer with custody for accounts. Clients are responsible for all tax consequences related to buying or selling securities in the account related to rebalancing or other allocation activities. The firm will work with a tax professional to assist in financial and tax planning.

All transactions are subject to client investment objectives, goals, restrictions, or client specific needs to tailor firm activities around. Clients may restrict certain activities upon request should they desire a lower level of account discretion.

Limited discretionary authority is granted only when clients have received all related disclosure and authorize the activity with the firm in their advisory agreement or advisory profile document. Restrictions for discretionary portfolio management authority will be detailed in the advisory profile document which includes advisor and client signed acknowledgments.

#### **Item 17 - Voting Client Securities**

The firm does not vote client securities, nor does it plan to accept such authority from its clients.

The firm does not advise how to vote a proxy for securities.

Consistent with client advisory agreement language, the firm takes zero action with respect to proxy voting or solicitation. Transfer agents, broker-dealer / custodian are the parties which will provide clients with proxy vote information and solicitation on client securities.

#### **Item 18 - Financial Information**

The firm does not solicit prepayment of more than \$500 in fees per client six months or more in advance. As a result, a balance sheet is not included with the disclosure. Traditional Asset Management clients do not pay any fees in advance. Consulting clients may pay an advance fee for associated project work but can pay us no more than \$500.

As the firm meets the statutory definition of custody given its ability to deduct advisory fees from client accounts, it is required to report any financial conditions of the advisory and its representatives that could impair the ability to meet contractual commitments to clients. The firm will update the brochure in the future should such financial concerns arise with a firm representative. Currently, there are no material negative financial conditions to disclose on any representative.

Neither the firm nor its representatives have been subject of a bankruptcy petition.

### **Item 19 - Requirements for State-Registered Advisers**

The Principal executive officers and management persons of the Firm are as follows:

Name & Title:	Anthony J. Deem, President & CCO
Date of Birth:	December 29, 1983
Education:	B.A. Finance, Walsh University, North Canton, Ohio, Class of 2006
Business Experience:	2006-2011, Market Research Associate, Cleveland Research Company 2011-2017, Associate Analyst, KeyBanc Capital Markets 2017-2019, Vice President, Senior Equity Research Analyst, Longbow Research 2020-2021, Senior Analyst, Investor Relations, Diebold Nixdorf 2015-Present, Sole Member and Manager of A2 Properties, LLC 2020-Present, President & CCO of Deem Asset Management, LLC

Mr. Deem has other general business activities that are not investment-related.

He is the only member of A2 Properties, LLC. It is an active workload averaging 10% or less of his available time to work on a weekly basis. The workload involves a portfolio of residential rental properties and lease agreements. Mr. Deem runs the day-to-day operations of the business such as finance, tenant relations, and property maintenance.

Neither the firm nor its representatives have been subject to proceedings with administrative or self-regulatory organizations. There are also no arbitration claims to disclose.

There is no significant relationship with security issuers that would cause a conflict of interest for clients.

No member or representative of the firm has a relationship or arrangement with an issuer of securities.

**Item 1 – Cover Page**

Deem Asset Management, LLC  
Firm CRD # 315845  
Anthony J. Deem, President & Chief Compliance Officer

Form ADV Part 2B: Brochure Supplement

2492 Country Club Dr.  
Uniontown, Ohio 44685

Phone: (330) 685-1975  
<https://deemasset.com/>

Effective: August 26, 2025

**This brochure supplement provides information about Anthony J. Deem that supplements the Deem Asset Management, LLC brochure. You should have received a copy of that brochure. Please contact Anthony Deem at (330) 685-1975 if you did not receive Deem Asset Management's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Anthony J. Deem is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 – Educational Background and Business Experience**

Principal executive officers and management persons:

Name & Title: Anthony J. Deem, President & CCO  
Date of Birth: December 29, 1983  
Education: B.A. Finance, Walsh University, North Canton, Ohio, Class of 2006  
Business Experience: 2006-2011, Market Research Associate, Cleveland Research Company  
2011-2017, Associate Analyst, KeyBanc Capital Markets  
2017-2019, Vice President, Senior Equity Research Analyst, Longbow Research  
2020-2021, Senior Analyst, Investor Relations, Diebold Nixdorf  
2015-Present, Sole Member and Manager of A2 Properties, LLC  
2020-Present, President & CCO of Deem Asset Management, LLC

## **Item 3 - Disciplinary Information**

There is no applicable information on Anthony J. Deem that are material to a client's or prospective client's evaluation of his integrity as it relates to: a) disciplinary events; b) criminal or civil actions; c) administrative proceedings; d) self-regulatory organization proceedings; e) any other proceedings.

## **Item 4 - Other Business Activities**

Mr. Deem has no other investment related activities for compensation.

Mr. Deem has other general business activities that are not investment related. He is the only member of A2 Properties, LLC. It is an active workload averaging less than 10% of his available time to work on a weekly basis. The workload involves a portfolio of residential rental properties and lease agreements. Mr. Deem runs the day-to-day operations of the business such as finance, tenant relations, and property maintenance.

Neither the firm nor its representatives have been subject to proceedings with administrative or self-regulatory organizations. There are also no arbitration claims to disclose.

There is no significant relationship with security issuers that would cause a conflict of interest for clients.

No member or representative of the firm has a relationship or arrangement with an issuer of securities.

## **Item 5 - Additional Compensation**

Mr. Deem does not receive an economic benefit or additional compensation from anyone who is not a client of our investment advisory services.

Mr. Deem actively seeks third party solicitor arrangements in Ohio that may generate income. The firm does not seek these arrangements in Maine. Agreements will be in place with entities or individuals that provide client referrals in exchange for a fee. This is potentially a conflict of interest. Before any fees are paid to a solicitor in exchange for a referral, they will enter into an agreement requiring delivery of a disclosure to the prospective client which details the arrangement. Solicitors must be in full compliance with all mandates required by the State of Ohio and to be in good standing as a Solicitor as outlined in Ohio Revised Code.

#### **Item 6 – Supervision**

Mr. Deem is self-supervised at the firm within internal operations given his additional role and responsibility as the Chief Compliance Officer (CCO). Mr. Deem has implemented compliance procedures designed to ascertain suitability for specific investment advice given to individual clients. Mr. Deem is required to comply with the firm's compliance policy and procedures and its code of ethics.

Name, Title and Telephone Number: Anthony J. Deem, President & Chief Compliance Officer, (330) 685-1975.

#### **Item 7 - Requirements for State-Registered Advisers**

There are no material facts to provide on Mr. Deem as it relates to being involved in a bankruptcy petition.

There are no material facts to provide on Mr. Deem for disciplinary events, being found liable in arbitration claims, civil proceedings, self-regulatory organization proceedings, or administrative proceedings.