

# DISCLOSURE BROCHURE

THE INVESTMENT ADVISERS ACT OF 1940 RULE 203-1

**Part 2A of Form ADV: Firm Brochure**

## Kris Lewicki & Associates, LLC



*An Independent Option for Wealth Management*

Firm IARD/CRD #: 156536

**Kris Lewicki & Associates, LLC**

REGISTERED INVESTMENT ADVISER

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This Disclosure Brochure provides information about the qualifications and business practices of Kris Lewicki & Associates, LLC, which should be considered before becoming a client. You are welcome to contact us if you have any questions about the contents of this brochure - our contact information is listed to the right. Additional information about Kris Lewicki & Associates, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator. Furthermore, the term "registered investment adviser" is not intended to imply that Kris Lewicki & Associates, LLC has attained a certain level of skill or training.

BROCHURE  
DATED

**28  
MARCH  
2025**



## MATERIAL CHANGES

ITEM 2

SEC Rule 204-3(b)(2) allows us to provide you with a summary page of Material Changes in lieu of sending out our entire Disclosure Brochure. If you are being offered this Material Change page as a separate piece from our Disclosure Brochure and you have questions about these summary disclosures or would like a current copy of our Disclosure Brochure to review, **you may contact us, and a current, complete Disclosure Brochure will be sent free of charge.**

### Owners

Travis M. Lewicki has assumed majority ownership of Kris Lewicki & Associates, LLC from Kristof S. Lewicki. Control of the firm remains with the existing management, and no new ownership interests have been introduced.

### KRIS LEWICKI & ASSOCIATES, LLC

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This brief is being provided to you as a summary of what has been fully disclosed in our Disclosure Brochure dated March 28, 2025. The information contained on this Material Change page has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator.



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## ADVISORY BUSINESS

ITEM 4

### Who We Are

Kris Lewicki & Associates, LLC (hereinafter referred to as “KLA”, “we”, “us” and “our”) is a fee-only<sup>1</sup> registered investment adviser<sup>2</sup> offering financial services<sup>3</sup> since 2011. KLA was established to help you, our client<sup>4</sup>, navigate all your financial challenges. We accomplish this by using a strategic wealth management approach. Each area is important individually but managing them collectively is one of the most important factors in overall financial success.

#### Owners

The following person controls KLA:

Name	Title	CRD#
Travis M. Lewicki	Managing Member	7112386
Kristof S. Lewicki	Member & Chief Compliance Officer	2714690

#### Our Mission

Our mission is to invest in your financial future as if it were our own. Our clients always receive a sound and disciplined plan focused on their specific financial goals.

### Assets Under Management

As of December 31, 2024, our assets under management totaled:

Discretionary Accounts..... \$83,600,000

We do not offer non-discretionary investment management services.

### What We Do

We provide **financial solutions** that stress the importance of you making fiscally responsible decisions and disciplined economic choices in your personal life, so we can effectively help you achieve your monetary goals.

<sup>1</sup> As a “fee-only” registered investment advisor, KLA does not receive compensation from any source other than what is directly paid by you, our client, for the services we provide.

<sup>2</sup> The term “registered investment advisor” is not intended to imply that Kris Lewicki & Associates, LLC has attained a certain level of skill or training. It is used strictly to reference the fact that we are “Registered” as an “Investment Advisor” with the Florida Office of Financial Regulation - and with such other regulatory agencies that may have limited regulatory jurisdiction over our business practices.

<sup>3</sup> Kris Lewicki & Associates, LLC is a **fiduciary**, as defined within the meaning of Title I of the Employee Retirement Income Security Act of 1974 (“ERISA”) and/or as defined under the Internal Revenue Code of 1986 (the “Code”) for **any financial services provided to a client who is:** (i) a plan participant or beneficiary of a retirement plan subject to ERISA or as described under the Code; or (ii) the beneficial owner of an Individual Retirement Account (“IRA”).

<sup>4</sup> A client could be an individual and their family members, a family office, a foundation or endowment, a charitable organization, a corporation and/or small business, a trust, a guardianship, an estate, a retirement plan, or any other type of entity to which we choose to give investment advice.



Focus of our advisory services begins with identifying your standards of living and quality of lifestyle expectations. We will accomplish this through an initial meeting where we will review the financial documents we asked you to bring for discussion. Together questions will be asked, information shared, and an evaluation made as to whether we should move to the next step. During the meeting, we will:

- ❖ Learn about your core values and guiding principles
- ❖ Seek to understand your financial concerns and how you have been addressing them
- ❖ Discover your financial objectives and what success looks like for you
- ❖ Create a preliminary internal profile consisting of your current income and expenses, assets and liabilities, career objectives, investment goals, risk tolerance and investment time horizon, targeted rate of return, and prior investment experience, along with personal information about your relationships, your values, and interests

Moving forward from our initial meeting, should you choose to engage us for our advisory services, we will begin the process of identifying your life goals (i.e., core values, family, monetary needs, future plans, etc.). The best advice we could offer you is that success, achievement, and contentment in life have little to do with personal wealth but are instead related to your life goals. We will make every effort to embrace these life goals and develop economic solutions that reflect how *you* define true wealth -- not us. Our services include:

### Portfolio Management

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Our portfolio management strategies focus on designing and managing a diversified allocation mix of equity ("stock") positions, fixed income/debt ("bond") instruments, Investment Company ("mutual funds") products, and exchange traded funds ("ETFs") to achieve the best return on your investment capital<sup>5</sup>.

Information regarding our management fee structure is disclosed under "Portfolio Management Fee" in Item 5, "**Fees & Compensation**" and further description of our investment strategies under Item 8, "**Methods of Analysis, Investment Strategies & Risk of Loss**".

### Financial Planning

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Financial planning is one of the most important tools that successful people use to create an extraordinary personal life and business career. However, it **requires a lifetime commitment**, not only from us, the financial planning firm, but from you as well.

### Being Fiscally Responsible

Planning for your future, regardless of the type of planning you need, is all about being fiscally responsible. A well-designed plan is a step-by-step process intended to identify and clarify purpose, personal and family core values, needs, and priorities to align your financial decisions with your goals in all areas of your life. Planning includes:

1. Arriving at a series of decisions and action items based on current and future financial circumstances and defined goals and objectives;
2. Projecting the consequences of these decisions for you in the form of an economic plan - **a working blueprint**; and,
3. Implementing the protocols outlined in the plan to achieve the plan objectives.

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<sup>5</sup> You may, at any time, impose restrictions in writing on the securities we may recommend (i.e., limit the types/amounts of particular securities purchased for your account, etc.).



Once complete, the plan, or working blueprint, becomes the benchmark that is used to help us evaluate where you are in achieving your financial goals, needs, and objectives.

### Preparing the Financial Plan

We offer a broad-based approach to financial advice that distinguishes financial planning practitioners from other professional advisers who typically focus on one area of a person's life. CFP® practitioners follow certain standards - called *Financial Planning Practice Standards* - when providing financial planning. These standards are based on the six-step financial planning process:

- ❖ Establish and defining the client-planner relationship.
- ❖ Gathering client data including core values, mission, vision, and goals.
- ❖ Analyzing and evaluating the client's financial status.
- ❖ Developing and presenting financial planning recommendations and/or alternatives.
- ❖ Implementing the financial planning recommendations.
- ❖ Monitoring the financial planning recommendations.

When providing financial planning, a CFP® practitioner has agreed to define the scope of the work she or he will do with you, explain and document the services she or he will provide, discuss the method of compensation and relay any other relevant information. CFP® practitioners are also required to work with you to determine your personal and financial goals, your tolerance for financial risk, and your time frame for achieving results. *Practice Standards* also require a CFP® practitioner to gather all necessary financial information about you when developing your personal financial plan.

More specifically the financial plan may include, but is not limited to, the following modules:

- ❖ Financial statements - cash flow and balance sheet.
- ❖ Savings and emergency reserves.
- ❖ Asset allocation and investment portfolio analysis.
- ❖ Income tax in collaboration with your tax adviser.
- ❖ Risk management and insurance analysis.
- ❖ Retirement and income analysis.
- ❖ Estate and family legacy planning in collaboration with your legal adviser.
- ❖ Business succession planning.
- ❖ Outline of recommendations, strategies, solutions and resources.
- ❖ Prioritizing and implementing the written action plan.
- ❖ Investment consultations that allow us to create and implement a customized investment strategy tailored to your long-term investment goals.
  - Prepare a professional investment proposal that can include a written Investment Policy Statement ("IPS"), if requested.
  - Access to our open-architecture platform with a variety of investment management solutions.
- ❖ Facilitate meetings with you and/or advisers or specialists within our professional network.
- ❖ Coordinate and facilitate meetings with family members, business associates, partners or other key individuals to assist with implementing your action plan.

It is expressly understood and agreed between the parties hereto that KLA and its representatives are not qualified to render tax advice or prepare tax documents for the implementation of your financial plan. You hereby agree that you and your personal accountant shall be solely responsible for the rendering of tax advice and/or preparation of all tax matters.



For information on our fees for financial planning, see “Financial Planning Fees” under Item 5, “Fees & Compensation.”

## FEES & COMPENSATION

ITEM 5

Prior to conducting any advisory services on your behalf, we will meet with you to discuss your financial situation and have you complete a profile questionnaire. The objectives we strive to accomplish with you during this meeting are to:

- ❖ Diagnose your current financial need;
- ❖ Address your financial concerns and answer your questions on how we can assist you;
- ❖ Recommend financial resolutions aimed at lowering costs, reducing risks, increasing expected returns, and/or increasing tax efficiency to improve the likelihood of successfully achieving your goal;
- ❖ Explain our investment methodology and how our investment strategies work; and,
- ❖ Explain the benefits of financial planning and how a comprehensive evaluation of wealth management needs is beneficial beyond just managing your investable assets.

From the meeting we will begin the process to manage your investment portfolio and, if needed, prepare a financial plan. If you wish no further interaction with us, all financial services discussed will have been concluded and we are not responsible to implement the advice or for any on-going supervision, monitoring, and/or reporting.

### Portfolio Management Fee

Portfolio management is provided on an **asset-based fee**<sup>6</sup> arrangement. Management fees are calculated based on the **aggregate market value**<sup>7</sup> of your account on the last business day of previous calendar quarter multiplied by one-fourth (e.g.,  $1.20\% \div 4 = 0.30\%$ ) the corresponding annual percentage rate for each portion of your portfolio assets that fall within each tier (see “Billing” below under “Protocols for Portfolio Management” for more information on how the fee is calculated).

We retain discretion to negotiate the management fee within each tier on a client-by-client basis depending on the size, complexity, and nature of the portfolio managed. In addition, as your portfolio value exceeds each tier level, either through additional deposits or asset growth, a fee break will occur. The tier breaks are as follows:

Portfolio Value	Annual Fee Rate Not to Exceed
First \$500,000.....	1.20%
Next \$500,000 .....	0.90%
Next \$4,000,000 .....	0.70%
Over \$5,000,000 .....	0.40%

<sup>6</sup> An asset-based fee is a percentage fee charged based on your assets under management for our professional time giving continuous advice, managing investment strategies, and suggesting investment options. We receive no other compensation for this advisory service unless first disclosed to you.

<sup>7</sup> The “market value” of your account can include margin loan balances when the margined assets are withdrawn and used to secure transactions away from the custodial firm. See “Margin Loan Balances” below under “Protocols for Portfolio Management.”



We have a **\$3,000 minimum annual fee** requirement (\$750 billed quarterly), which **may be waived or reduced** if we feel circumstances are warranted. Accounts with **portfolio values that fall below \$250,000 may be subject to this minimum annual fee**, which can cause our fee to exceed our highest published 1.20% Annual Fee Rate (e.g., a managed account of \$100,000 with a minimum annual fee charge of \$3,000, will translate into an annual fee rate of 3.00%). Keep in mind, the further your portfolio value drops below \$250,000 the higher the annual fee rate. Financial planning fees do not count towards this minimum annual fee requirement.

### Protocols for Portfolio Management

The following protocols establish how we handle our portfolio management accounts and what you should expect when it comes to: (i) managing your account; (ii) your bill for investment services; (iii) deposits and withdrawals of funds; and (iv) other fees charged to your account(s).

#### Discretion

We will establish discretionary trading authority on all management accounts to execute securities transactions at any time without your prior consent or advice.

However, you may at any time impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, etc.).

#### Billing

Your account will be **billed quarterly in advance** based on the fair market value for the portion of your portfolio that **falls within each tier** of our fee schedule.

As your portfolio value exceeds into the next tier level, either through additional deposits or asset growth, the amount of assets above the fee-break will be billed the corresponding annual fee rate. This results in a blended fee and **effectively lowers the annual fee costs** to manage your portfolio.

Account Value: \$5,500,000	Annual Fee % (Per Tier)	Tier Fee Contribution (Based on the Account Value Within Each Tier)
First \$500,000	1.20%	0.109%
Next \$500,000	0.90%	0.081%
Next \$4,000,000	0.70%	0.509%
Over \$5,000,000	0.40%	0.037%
Blended Annual Fee %		0.736%

For **new managed** accounts opened in mid-quarter, our fee will be based upon a **pro-rated calculation of your assets to be managed** for the current quarterly period. For **existing management accounts**, pro-rated adjustments may be made for partial deposits between billing cycles. We **do not make partial refunds** of our quarterly fee for withdraws you make during a calendar quarter.

Advisory fees will be deducted first from any money market funds or cash balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees.





### Margin Loan Balances

In calculating our management fee, the “market value” of your account **may include** margin loan balances if you use your portfolio management account assets as collateral to secure transactions away from the custodial firm. A margin loan used in this manner reduces the market value of the portfolio by the amount of the loan while leaving your full investment holdings intact. Such use of your portfolio management account in this manner causes a significant reduction in your total account value and consequently our ability to charge a fair and just management fee if such fee, in this case, is based solely on the net market value of your portfolio.

It is further understood, billing advisory fees from the portfolio account that carries a margin loan will cause an increase in the margin loan balance resulting in additional interest charges by the custodian.

### Variable Annuity Sub-Account Management

We provide management services for no-load, fee-based RIA Variable Annuities, enabling us to oversee client assets within the investment sub-accounts of the variable annuity product. In these cases, the issuing insurance company or its designated custodian will retain custody of the funds and securities. Our Investment Advisor Representatives (IARs) will offer guidance on the holdings within the annuity’s sub-accounts and will have limited authority to make exchanges among the available investment options. Instead of earning commissions on these variable products, we will charge a management fee based on the arrangements disclosed above.

### Fee Exclusions

The above fees for all of our portfolio management services are exclusive of any charges imposed by the custodial firm who has custody of your account; including, but not limited to: (i) any Exchange/SEC fees; (ii) certain transfer taxes; (iii) service or account charges, such as, postage/handling fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term redemption fees; and (iv) brokerage and execution costs associated with securities held in your managed account. There can also be other fees charged to your account that are unaffiliated with our management services.

In addition, all fees paid to us for portfolio management services are separate from any fees and expenses charged on mutual fund shares by the Investment Company or by the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as 12b-1 fees. Redemption fees, account fees, purchase fees, contingent deferred sales charges, and other sales load charges may occur but are the exception within managed accounts at institutional custodians. A complete explanation of these expenses charged by the mutual funds/ETFs is contained in each mutual fund’s or ETF’s prospectus. You are encouraged to carefully read the fund prospectus.

For more information on the custodial firm that we will recommend to custody your portfolio accounts, see Item 12, “**Brokerage Practices**”.

### Termination of Portfolio Management Services

To terminate our investment advisory services, either party (you or us), by **written notification to the other party**, may terminate the Investment Advisory Agreement at any time. Such written notification should include the date the termination will go into effect along with any final instructions on the account (i.e., liquidate the account, finalize all transactions and/or cease all investment activity).



In the event termination does not fall on the first/last day of a calendar quarter, **you shall be entitled to a pro-rated refund** of the prepaid quarterly management fee based upon the number of days remaining in the quarter after the termination notice goes into effect. **Once the termination of investment advisory services has been implemented, neither party has any obligation to the other** - we no longer earn management fees or give investment advice and you become responsible for making your own investment decisions.

## Financial Planning Fee

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How we charge to develop a financial plan depends on the size, complexity, and nature of your personal and financial situation and the amount of time it will take to analyze and summarize the plan and perform the services you desire.

Financial planning services are offered on a **non-negotiable hourly rate of \$250** and, in limited instances, a flat fee may be offered for the design of a financial plan. Financial planning fees may be reduced, or in some instances waived, solely at our discretion, if your investment assets are managed by KLA.

The financial planning fee will be disclosed up-front in a Financial Planning Agreement, which will include the cost<sup>8</sup> to review your financial information and prepare the financial plan. We have the option to:

1. Require full payment up-front<sup>9</sup> with the expectation that the services will be completed within 60-days; or,
2. Require up to one-half the fee to be paid at the time the Agreement is signed, with the remaining balance due upon completion of the financial plan<sup>10</sup>.

## Financial Planning Annual Review Process

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It is important to note that any **planning is dynamic and alive**. A financial plan is a roadmap that is only as good as how well it reflects your current economic position to then guide you on a clear path to a future financial destination. However, you can veer off course, intentionally or unintentionally, as circumstances in your life take you down another path. An annual financial plan review is designed to systematically address these unexpected diversions and continually keep you on the right road headed to your future financial and life destination.

### Establishing Annual Review Dates

Once the initial financial planning services have been completed, we will establish future “Annual Review” dates. The Annual Review dates - generally begin after the first anniversary - will be to review and make adjustments, if necessary, to the financial plan. Together we will set the calendar dates for your future reviews.

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<sup>8</sup> Rarely will a fee exceed those costs outlined in the Agreement. However, there can be instances where we did not contract with you to perform a particular task and therefore merit notifying you of the additional cost prior to beginning such services.

<sup>9</sup> The recommendations made in a financial plan are generally completed within 30 to 60 days from you signing the Agreement. However, implementing the plan using outside professionals (i.e., attorneys, CPAs, etc...) may require additional time that is out of our control. Delays in providing information and/or frequent changes in your financial position during the plan development period may also cause delays in plan delivery and implementation beyond 60 days. Therefore, when we refer to the completion of the financial plan, we are referring to us (you and us) finalizing your financial benchmarks/objectives before approaching any outside professional.

<sup>10</sup> *Ibid.*



### Annual Review Fee

Annual Reviews are performed based on our hourly rate indicated above. We will always address with you the scope of the Annual Review before proceeding, so that you have an estimate of fees.

### Financial Planning Termination

You can terminate the Financial Planning Agreement at any time before the presentation of any final planning documents. We will be compensated through the date of termination for time spent in design of such financial documents at the hourly rate agreed to in the Agreement. If you have prepaid any fees, such un-earned fees will be returned on a pro-rata basis. **After the financial plan has been completed and presented to you, termination of the Agreement is no longer an option.**

### Annual Review Termination

Annual Review services can be terminated at any time. KLA will bill you for any services rendered from the date of the last bill up to the date of termination at the fee rate that was agreed to in the proposal, engagement letter and/or retainer agreement.

## PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

ITEM 6

We do not charge fees based on a share of capital gains or the capital appreciation of the assets held in your accounts.

## TYPES OF CLIENTS

ITEM 7

The types of clients we offer advisory services to are described above under “Who We Are” in the Item 4, the “Advisory Business” section. Our minimum account size and/or minimum fee for portfolio management is disclosed above under “Portfolio Management Fee” in Item 5 above in the, “Fees & Compensation” section of this Brochure.

## METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

ITEM 8

Our portfolio management services are designed to build long-term wealth while maintaining risk tolerance levels acceptable to you. We combine your financial needs and investment objectives, time horizon, and risk tolerance to yield an effective investment strategy. Your portfolio is then tailored to these unique investment parameters using a mix of equity (“stock”) positions, fixed income/debt (“bond”) instruments, Investment Company (“mutual fund”) products, and Exchange-Traded Funds (“ETFs”) to achieve the best return on your investment capital.

In addition, depending on your risk tolerance, we may also recommend using the following investment vehicles to achieve your desired investment objective: leveraged index funds, leveraged and inverse ETFs and Exchange-Traded Notes (“ETNs”), closed-end funds, hedge funds, derivatives (i.e., options, commodities, etc.), and other publicly/privately traded securities. **However, these investment vehicles bring on a different risk dynamic. If we**



recommend investment in one of these securities, we will discuss with you the limitations of such security and the potential risk factors to your portfolio.

## Methods of Analysis

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In analyzing securities to develop an efficient asset allocation portfolio, we will use a combination of analysis techniques to gather information and to guide us in our management decisions.

### Fundamental Analysis

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Fundamental analysis considers efficiency ratios, growth rates, enterprise value, economic conditions, earnings, cash flow, book value projections, industry outlook, politics (as it relates to investments), historical data, price-earnings ratios, dividends, general level of interest rates, company management, debt ratios and tax benefits.

**RISKS** - Fundamental analysis places greater value on the long-term financial structure and health of a company, which may have little to no bearing on what is actually happening in the market place. Investing in companies with sound financial data/strength and a history of health returns can be a good long-term investment to hold in your portfolio; however, such fundamental data does not always correlate to the trading value of the stock on the exchanges. In the short-term, the stock can decrease in value as investors trade in other market sectors.

### Quantitative Analysis

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Quantitative analysis seeks to understand the behavior of a security using mathematical and statistical modeling to measure certain unique characteristics such as, for example, revenues, earnings, margins, and market share. Mathematical and statistical modeling helps us to ascertain security price and risk to ultimately help identify profitable opportunities.

**RISKS** - The key benefit of quantitative analysis is its ability to reduce complex figures to a single piece of data that is easy to grasp, discuss, and support decision-making and investment recommendations. However, using quantitative analysis alone with no further evaluation is often too narrow and sometime misleading since focus is on financial data while neglecting other details such as management experience, employee attitudes, and brand recognition.

**Fundamental analysis** provides us with a broad long-term view of a security that begins with determining a company's value and the strength of its financials while **quantitative analysis** assists us with portfolio optimization techniques.

## Investment Strategies

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We are not bound to a specific investment strategy or ideology for the management of your investment portfolio. We understand markets and **money made** from increased stock values has greater risk (volatility) than **money earned** from dividends (secure and stable) in income-oriented securities. Our goal is to balance making and earning money by maintaining a disciplined management approach, regardless of the strategy, so as to not sacrifice long-term goals for short-term gains. However, our investment strategies generally incorporate these methodologies:



## Asset Allocation

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Asset allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk. From this we may use more narrow and aggressive asset allocation derivatives.

Other features of our asset allocation strategies can utilize these portfolio-modeling structures for analyzing various possible portfolio groupings of securities.

### Core-Satellite Approach

Core-Satellite is an investment strategy that blends a static (passive) and dynamic (active) investment management style to achieve more consistent tracking to asset class benchmarks. The objective behind the core-satellite approach is that most of the portfolio will be dedicated to matching its benchmark with low risk, while a smaller allocation will target enhanced returns so that, when the two elements are combined, the portfolio is potentially able to beat its benchmark in a risk-controlled manner.

### Modern Portfolio Theory

Modern Portfolio Theory (“MPT”)<sup>11</sup> is the analysis of a portfolio of stocks as opposed to selecting stocks based on their unique investment opportunity. The objectives of MPT is to determine your preferred level of risk and then construct a portfolio that seeks to maximize your expected return for that given level of risk.

### Strategic Allocation Modeling

Strategic asset allocation is a strategy that involves setting target allocations for various asset classes, then periodically rebalancing the portfolio back to the original allocations when target allocations deviate significantly from the initial setting due to differing returns from various assets.

## Alternative Investment Strategies

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We reserve the right to employ maximum flexibility regarding investments recommended to you. This includes, but is not limited to short sales, leveraged closed-end funds and ETFs/ETNs (including inverse and multiple-inverse leveraged ETFs and ETNs), dedicated short or long-short mutual funds and other alternative investments.

Leveraged and inverse ETFs/ETNs use financial derivatives and debt instruments to generate double or triple the daily performance of an underlying index or asset class; thus, increasing exposure to market swings. Before agreeing to this alternative investment strategy, **you should consider the following risk disclosures.**

Leveraged ETFs/ETNs:

- ❖ Are complex products that have the potential for significant loss of principal and are not appropriate for all investors. **Investors should consider their financial ability to afford the potential for a significant loss.**

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<sup>11</sup> The “Portfolio Theory” was developed and introduced by Harry M. Markowitz in his paper “Portfolio Selection” published in 1952 by the *Journal of Finance* while he was working on his PhD doctoral thesis at the University of Chicago. Mr. Markowitz further refined his theory during the latter part of the 1950’s and on into the 70’s. Along the way, his theory became known as the “Modern Portfolio Theory”. Mr. Markowitz won the Nobel Memorial Prize in Economic Sciences in 1990 as a co-laureate along with William Sharpe.



- ❖ Seek investment results for a single day only. The effect of compounding and market volatility could have a significant impact upon the investment returns. **Investors may lose a significant amount of principal rapidly in these securities.**
- ❖ May be more volatile under certain market conditions. **Investors holding leveraged ETFs/ETNs over longer periods of time should monitor those positions closely due to the risk of volatility.**
- ❖ Are focused on daily investment returns, and their performance over longer periods of time can differ significantly from their stated daily objective. **Investors may incur a significant loss even if the index shows a gain over the long term.**
- ❖ Use a variety of derivative products in order to seek their performance objectives. **The use of leverage in ETFs/ETNs can magnify any price movements, resulting in high volatility and potentially significant loss of principal.**
- ❖ May suffer losses even though the benchmark currency, commodity, or index has increased in value. **Investment returns of leveraged ETFs/ETNs may not correlate to price movements in the benchmark currency, commodity, or index the ETFs/ETNs seeks to track.**
- ❖ Some leveraged ETFs/ETNs may have a low trading volume, which could impact an investor's ability to sell shares quickly.
- ❖ May be less tax efficient. As with any potential investment, an investor should consult with his or her tax advisor and carefully read the prospectus to understand the tax consequences of leveraged ETFs/ETNs.

We may also depart significantly from recommended asset allocation as a tactical, generally short term move for defensive purposes or to take advantage of opportunities. We also may use cash as a tactical asset and we do charge advisory fees on cash, which may result in negative yield on the cash portion of your portfolio.

## Managing Risk

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The biggest risk to you is the risk that the value of your investment portfolio will decrease due to moves in the market. This risk is referred to as the **market risk** factor, also known as variability or volatility risk. Other important risk factors:

- ❖ **Interest Rate Risk** - Interest rate risk affects the value of bonds more than stocks. Essentially, when the interest rate on a bond begins to rise, the value (bond price) begins to drop; and vice versa, when interest rates on a bond fall, the bond value rises.
- ❖ **Equity Risk** - Equity risk is the risk that the value of your stocks will depreciate due to stock market dynamics causing one to lose money.
- ❖ **Currency Risk** - Currency risk is the risk that arises from the change in price of one currency against that of another. Investment values in international securities can be affected by changes in exchange rates.
- ❖ **Liquidity Risk** - A financial risk where a company is unable to meet short-term financial obligations without selling either hard-assets or finding another way to reduce the discrepancy between cash flow and debt obligations.
- ❖ **Inflation Risk** - The reduction of purchasing power of investments over time.
- ❖ **Commodity Risk** - Commodity risk refers to the uncertainties of future market values and the size of future income caused by the fluctuation in the prices of commodities (i.e., grains, metals, food, electricity, etc...).

The risk factors we have cited here are not intended to be an exhaustive list but are the most common risks your portfolio will encounter. Other risks that we haven't defined could be political, and over-concentration to name a few. However, notwithstanding these risk factors, the most important thing for you to understand is that regardless of how we analyze securities or the investment strategy and methodology we use to guide us in the management of your





investment portfolio, investing in a security involves a risk of loss that you should be willing and prepared to bear; and furthermore, past market performance is no guarantee that you will see equal or better future returns on your investment.

## DISCIPLINARY INFORMATION

ITEM 9

We have no legal or disciplinary events to report.

## OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

ITEM 10

We are a fee-only registered investment advisor; none of our supervised persons are licensed with, or are related to, another financial industry participant. However, Travis M. Lewicki is licensed, as required by the State of Florida, as an Unaffiliated Insurance Agent to offer advice, counsel, and/or make recommendations on insurance related products on a fee basis.

As an Unaffiliated Insurance Agent, Mr. Lewicki can charge you a fee for analyzing insurance policies and/or comparing insurance products and how such policy will best benefit you. He can also recommend the insurance company, agency, and agent to underwrite the insurance policy - all for a fee. This arrangement, even though Mr. Lewicki does not receive or share any commissions, can still create potential conflicts with the incentive to: (i) analyze insurance products to generate additional fee income; and (ii) refer your business to those financial industry professionals that in turn refer potential clients to KLA. Consequently, because of this situation, there is potential for divided loyalty and the objectivity of the advice rendered subjective and a disadvantage to you. Therefore, to ensure you understand the choices and risks you have receiving advice about insurance products on a fee basis, the following disclosures are provided to assist you with your decision:

- ❖ You are under no obligation to accept Mr. Lewicki's recommendation that he analysis any insurance products on your behalf.
- ❖ Should you choose to have Mr. Lewicki perform any insurance product review for a fee, you are under no obligation to have any professional Mr. Lewicki recommend write the insurance policy. You are free to choose any independent insurance agent and insurance company to purchase your insurance.

## CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING

ITEM 11

### Code of Ethics

As a fiduciary, KLA has an affirmative duty to render continuous, unbiased financial advice, and at all times act in your best interest. To maintain this ethical responsibility, we have adopted a Code of Ethics that establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing such persons to uphold the highest ethical standards, rooted in the most elementary maxim. Our Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- ❖ Honest and ethical conduct.
- ❖ Full, fair and accurate disclosure.



- ❖ Compliance with applicable rules and regulations.
- ❖ Reporting of any violation of the Code.
- ❖ Accountability.

To help you understand our ethical culture and standards, how we control sensitive information and what steps have been taken to prevent personnel from abusing their inside position, a copy of our Code of Ethics is available for review upon request.

## Client Transactions

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We have a fiduciary duty to ensure that your welfare is not subordinated to any interests of ours or of our personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting all of our clientele.

### Participation or Interest

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It is against our policies for any owners, officers, directors and employees to invest with you or with a group of clients, or to advise you or a group of clients to invest in a private business interest or other non-marketable investment unless prior approval has been granted by our **Chief Compliance Officer, Kristof S. Lewicki**, and such investment is not in violation of any SEC and/or State rules and regulations.

### Insider Trading Policy

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KLA complies with the Insider Trading and Securities Fraud Enforcement Act of 1988. KLA does not share any non-public information with anyone who does not need to know and has set-up internal controls to guard your personal information.

### Class Action Policy

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KLA, as a general policy, does not elect to participate in class action lawsuits on your behalf. Rather, such decisions shall remain with you or with an entity you designate. We may assist you in determining whether you should pursue a particular class action lawsuit by assisting with the development of an applicable cost-benefit analysis, for example. However, the final determination of whether to participate, and the completion and tracking of any such related documentation, shall generally rest with you.

## Personal Trading

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Employees of ours are permitted to personally invest their own monies in securities, which may also be, from time to time, recommended to you. Sometimes, such investment purchases are independent of, and not connected in any way to, the investment decisions made on your behalf. However, there may be instances where investment purchases for you may also be made, at or about the same time, in an employee's account. This practice can create a conflict of interest as our employees may benefit from the sale and purchase of those securities. In these situations, we have implemented the following guidelines in order to ensure our fiduciary integrity:

1. No employee acting as an Investment Advisor Representative ("IAR"), or who has discretion over your account, shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. No employee of ours shall prefer his or her own interest to that of yours or any other advisory client.





2. Our Chief Compliance Officer reviews securities holdings for all our access employees on a regular basis.
3. We require that all employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
4. Bunched orders (See “Aggregating Trade Orders” below under Item 12, “**Brokerage Practices**”) may include employee accounts. In such cases, priority and advantage will be given to satisfy your order first regardless of the situation.
5. Any individual not in observance of the above may be subject to termination.

Personal trading activities are monitored by our Chief Compliance Officer to ensure that such activities do not impact your security or create conflicts of interest

## BROKERAGE PRACTICES

**ITEM 12**

### Custodial Services

KLA maintains a custodial relationship with Charles Schwab & Company, Inc. (“Schwab”), a registered broker-dealer (member FINRA/SIPC), offering custodial services through their division Schwab Advisor Services to investment advisors. Schwab offers us services which include custody of securities, trade execution, clearance and settlement of transactions.

Our recommendation for you to custody your assets with Schwab has no direct correlation to the services we receive from Schwab and the investment advice we offer you, although **we do receive economic benefits for which we do not have to pay** through our relationship with Schwab that are typically not available to Schwab retail clients. This creates an incentive for us to recommend Schwab based on the economic benefits we receive rather than on your interest in receiving most favorable execution. These economic benefits include the following products and services provided without cost or at a discount:

- ❖ Receipt of duplicate client statements and confirmations;
- ❖ Research related products and tools and consulting services;
- ❖ Access to a dedicated trading desk;
- ❖ Access to batch trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to accounts);
- ❖ The ability to have advisory fees deducted directly from accounts;
- ❖ Access to an electronic communications network for order entry and account information; and,
- ❖ Access to mutual funds and ETFs with no transaction fees and to certain institutional money managers.

**We are not a subsidiary of, or an affiliated entity of, Schwab.** We have sole responsibility for investment advice rendered, and our advisory services are provided separately and independently from Schwab.

### Direction of Transactions and Commission Rates (Best Execution)

**We have a fiduciary duty to put your interests before our own.** The advisory support services we receive from Schwab creates an economic benefit to us and a potential conflict of interest to you; in that, our recommendation to custody your account(s) with Schwab may have been influenced by these arrangements/services. **This is not the case;** we have selected Schwab as our custodian of choice based on:



1. Their competitive transaction charges, trading platform, and on-line services for account administration and operational support.
2. Their general reputation, trading capabilities, investment inventory, their financial strength, and our personal experience in working with Schwab staff.

Since we do not recommend, suggest, or make available a selection of custodians other than Schwab, **best execution may not always be achieved**. Therefore, **you do not have to accept our recommendation to use Schwab as your custodian**. However, if you direct us to use another custodian, **we may not be able to provide you complete institutional services and such service may cost you more in transaction fees**.

## Aggregating Trade Orders

Our objective in order execution is to act fairly, impartially, and to take all reasonable steps to obtain the best possible results (known as “best execution”) for our clients. Therefore, we typically bunch (aggregate) orders for a block trade when: (i) the bunching of orders is done for the purpose of achieving best execution; and, (ii) no client is systematically advantaged or disadvantaged by bunching the orders.

In consideration of these objectives, we will take into account the unique execution factors of the buy/sell order before bunching accounts for a block trade. A few of those factors are:

- ❖ **Security Trading Volume** - Bunching orders in a block trade can secure price parity and continuity for our clients during heavy trading activity.
- ❖ **Number of Clients** - The fewer the number of client accounts involved in the bunched order may not yield better pricing or order execution; it may be more advantageous to perform an individual market order for each client. In addition, preparing individual market orders, for the small number accounts involved, may be quicker to complete than preparing a bunch order.
- ❖ **Financial Instruments** - The type of security involved as well as the complexity of order can affect our ability to achieve best execution.

## REVIEW OF ACCOUNTS

ITEM 13

### Portfolio Management Reviews

Your investment strategies and investments will be managed by the management person over your account and monitored and reviewed by Kristof S. Lewicki and/or Travis M. Lewicki (under the supervision of Kristof S. Lewicki) on an on-going basis. The general economy, market conditions, and/or changes in tax law can trigger more frequent reviews. Cash needs will be adjusted as necessary. Material changes in your personal/financial situation and/or investment objectives will require additional review and evaluation for us to properly advise you on revisions to previous recommendations and/or services. However, it is **your responsibility to communicate these changes** for us to make the appropriate corrections to your management account(s).

You will receive statements, at least quarterly, from Schwab where your account(s) are held in custody that identifies your current investment holdings, the cost of each of those investments, and their current market values.

You are encouraged to review the trading activities disclosed on your account statements which summarizes your portfolio account value, current holdings, and all account transactions



made during the quarter. It is important for you to review these documents for accurate reporting and to determine whether we are meeting your investment expectations.

## Financial Planning Reviews

The management person who prepared your financial plan will work closely with you to be sure the action points identified in the financial plan have been or are being properly executed. Once the action points have been completed, the financial plan should be reviewed at least annually. Material changes in your lifestyle choices, personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, **it is your responsibility to communicate these changes to us** so that the appropriate planning adjustments can be made.

## CLIENT REFERRALS & OTHER COMPENSATION

ITEM 14

### Referral Compensation

We do not receive any economic benefit from an independent party for managing your account(s). In addition, we do not compensate persons/firms for client referrals.

### Other Compensation (Indirect Benefit)

The Company receives an indirect economic benefit from Charles Schwab & Company, Inc. (See “Custodial Services” above under Item 12, “**Brokerage Practices**” for more detailed information on what these services and products could be.)

### Financial Planning Compensation

There are also potential conflicts of interest when we recommend outside consultations and professional services (i.e., attorneys, accountants, insurance agents, etc.) to implement certain aspects of a financial plan. Even though KLA, Kristof S. Lewicki, and Travis M. Lewicki do not share in any fees earned by the outside professionals when implementing the financial plan or receive any commission in recommending insurance products or brokerage services, it does create an incentive on our part to refer your business to only those professionals that in turn refer potential clients to us. This can eliminate the possibility for you to be referred to someone who may provide equivalent professional services, and possibly at a lower cost.

Therefore, to ensure you understand the choices and risks you have regarding the financial recommendations we offer in a financial plan, the following disclosures are provided to assist you with your decisions:

- ❖ Certain aspects of a financial plan require the assistance of a registered representative of a broker-dealer to execute transactions. We do not earn commissions; however, the Registered Representative you hire will.
- ❖ If you need any insurance coverage, we can refer you to a licensed insurance agent. **The insurance agent will receive the normal commissions associated with such insurance transactions.**
- ❖ You are under no obligation to have any related parties that we recommend prepare planning documents (i.e., financial, estate, tax, insurance agent, registered representative, etc. ...). **You are free to choose those outside professionals to implement the recommendations made in the financial or estate plan.**



- ❖ The Company does not receive any economic benefit from referring you to another professional without first notifying you of such possibilities.

Notwithstanding such potential conflicts of interest, we strive to serve your best interest and ensure such disclosures are being properly made to you in compliance with the Investment Advisers Act of 1940, Rule 275.206.

## Retirement Rollover Compensation

Earning a management fee from recommending the rollover of retirement plan assets to an IRA we manage is considered “self-dealing” and prohibited unless we comply with the Prohibited Transaction Exemption (“PTE”) 2020-02, “Improving Investment Advice for Workers & Retirees” exemption issued by the Department of Labor. The DOL considers earning a management fee “self-dealing” because it increases our compensation and profits while potentially disregarding the underlying costs paid by, and the services provided under, the retirement plan that might be more beneficial to you should your retirement assets remain with the plan. Therefore, when it comes to your retirement assets, there are typically four options you should consider when leaving an employer:

- ❖ Leave the account assets in the former employer’s plan, if permitted.
- ❖ Rollover the assets to the new employer’s plan if one is available and rollovers are permitted.
- ❖ Rollover the account assets to an Individual Retirement Account (an “IRA”); or,
- ❖ Cash out the retirement account assets (There may be tax consequences and/or IRS penalties depending on your age.).

Should you approach us to advise you on which option would be the best for your situation, we have an economic incentive to recommend you rollover your retirement account to a managed IRA account with us where we would earn a management fee on the assets. This can create a conflict of interest and the objectivity of the advice we render subjective and a disadvantage to you. Therefore, if we recommend you rollover your retirement account to an individually managed IRA account, you are under no obligation to engage us to manage your assets. You are free to take your account anywhere.

## CUSTODY

ITEM 15

### Management Fee Deduction

We do not take possession of or maintain custody of your funds or securities but will simply monitor the holdings within your portfolio and trade your account based on your stated investment objectives and guidelines. Physical possession and custody of your funds and/or securities are maintained with Charles Schwab & Company, Inc. as indicated above in Item 12, “Brokerage Practices.”

We are however defined as having custody since you have authorized us to deduct our advisory fees directly from your account. To protect you as well as to protect our advisory practice, we have implemented the following regulatory safeguards:

- ❖ We report to the regulatory authority (the Florida Office of Financial Regulation) having jurisdiction over our advisory practice that we have custody.
- ❖ Your funds and securities will be maintained with a qualified custodian (Schwab) in a separate account in your name.



- ❖ Authorization to withdraw our management fees directly from your account will be approved by you prior to engaging in any portfolio management services.
- ❖ At the time we notify the qualified custodian to withdraw our quarterly fee from your account, we will send you a quarterly notice itemizing our fee. Itemization includes the formula used to calculate our fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

Schwab is required by law to send you, at least quarterly, statements summarizing the specific investments currently held in your account, the value of your portfolio, and account transactions. **You are encouraged to compare the financial data contained in our report and/or itemized fee notice with the financial information disclosed in your account statement from Schwab to verify the accuracy and correctness of our reporting.**

### Standing Letters of Authorization

We will allow you to maintain a Standing Letter of Authorization (“SLOA”) with our firm. However, SLOAs with asset transfer **instructions to a third-party** (e.g., any person/entity/joint account other than just you alone) define us as having custody under the Custody Rule (1940 Act Rule 206(4)-2). Therefore, to comply with the No-Action Letter issued by the SEC, relating to SLOAs and the Custody Rule, we have implemented the following regulatory safeguards and will only accept SLOAs under these conditions:

- ❖ The person and place of delivery must always be identified in the SLOA instructions. We will not approve any SLOAs where we are authorized to modify the instructions relating to the person and/or place of delivery.
- ❖ We will not accept SLOA instructions for delivery to a person affiliated with our firm and/or located at our place of business.
- ❖ The timing and amount of assets to transfer can be open-ended per the instructions of the SLOA.
- ❖ All SLOA instructions must be in writing and confirmed with your signature. We will not accept verbal changes to any SLOAs.

The SEC SLOA No-Action Letter identifies seven (7) steps to follow as part of the safekeeping requirements. The first two bullet-points above are our responsibility under the No-action Letter, the remaining five (5) are the responsibility of the qualified custodian (Schwab). If you would like a complete list of the safekeeping instructions, let us know and we will be glad to provide you a copy.

### INVESTMENT DISCRETION

ITEM 16

We have you complete our Investment Advisory Agreement, which sets forth our discretionary trading authority to buy and sell securities in whatever amounts are determined to be appropriate for your account and whether such transactions are with, or without, your prior approval.

You may, at any time, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.).



## VOTING CLIENT SECURITIES

ITEM 17

**We do not vote client proxies.** You understand and agree that you retain the right to vote all proxies solicited for securities held in your managed accounts. Schwab, the custodian of your managed accounts, will mail you all proxy solicitations. Any proxy solicitations inadvertently received by us will be immediately forwarded to you for your evaluation and decision.

If you have specific questions regarding an action being solicited by the proxy that you do not understand, or you want clarification, you may contact us, and we will explain the particulars. **Keep in mind we will not advise you in a direction to vote; the ultimate decision on how you vote is your responsibility and left to you to decide.**

## FINANCIAL INFORMATION

ITEM 18

We are not required to include financial information in our Disclosure Brochure since we will not take physical custody of client funds or securities or bill client accounts six (6) months or more in advance for more than \$500.

We are not aware of any current financial conditions that are likely to impair our ability to meet our contractual commitments to you. In addition, the Company has not, nor have any of our officers and directors, been the subject of a bankruptcy petition at any time during the past ten years.

## REQUIREMENTS FOR STATE-REGISTERED ADVISERS

ITEM 19

Information of each of our principal executive officers and management/supervised persons can be found in the attached Form ADV Part 2B: Brochure Supplements.

In addition, none of our principal executive officers and supervised persons, executive officers or management persons has any legal or disciplinary events to report. Also, none of our principal executive officers and management/supervised persons has a relationship or arrangements with any issuer of securities.

**END OF DISCLOSURE BROCHURE**



## FORM ADV: PART 2B

### BROCHURE SUPPLEMENT



## Kris Lewicki & Associates, LLC

7401 Wiles Road, Suite 323  
Coral Springs, Florida 33067

### CONTACT INFORMATION

Tel: 954.324.3550  
Fax: 954.252.4131

[www.KrisLewickiandAssociates.com](http://www.KrisLewickiandAssociates.com)

### SUPERVISION

**Kristof S. Lewicki**  
Chief Compliance Officer

**Telephone:**  
954.324.3550  
**e-Mail:**  
[krisl@klewickiassociates.com](mailto:krisl@klewickiassociates.com)

Mr. Lewicki is responsible for the regulatory oversight of our advisory practice - ensuring our business activities are compliant with all federal and state regulations and that we are operating in compliance with our written policies and procedures.

His other duties include, but are not limited to: supervising investment activities, preparing planning documents, and performing client reviews and meeting to discuss investment options.

BROCHURE SUPPLEMENT  
DATED

28

**MARCH  
2025**

This Brochure Supplement provides information about Kristof S. Lewicki that is an accompaniment to the Disclosure Brochure for our firm, Kris Lewicki & Associates, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Lewicki, you are welcome to contact us - our contact information is listed to the left.

Additional information about Kris Lewicki & Associates, LLC and Kristof S. Lewicki are also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Kristof S. Lewicki, CFP®, ChFC®, CASL®

CRD#: 2714690

Year of Birth: 1959

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### Education

1984 - Academy of Physical Education in Warsaw, Poland: Masters in Sports Physiology

#### Licenses

FINRA Exams: Series 7 - General Securities Representative Examination (Retired)  
Series 24 - General Securities Principal Examination (Retired)  
Series 63 - Uniform Securities Agent State Law Examination (Retired)

Insurance: 2-15 License - Florida Life, Health & Variable Annuity Insurance (Retired)

Designations: **CERTIFIED FINANCIAL PLANNER™ (CFP®) Certification<sup>1</sup> (CFP® since 2000)** - The CFP® designation is issued by the Certified Financial Planner Board of Standards, Inc. The CFP® requires certificate holders to have a bachelor's degree, three (3) years professional working experience in the area of financial planning, and to successfully pass the examination process. To retain their CFP® designation certificate holders are required to pay an annual certification fee, complete 30-hours of continuing education every two (2) years, and adhere to the CFP® Board's Code of Ethics and Professional Responsibility, Rules of Conduct, and Financial Planning Practice Standards. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**Chartered Financial Consultant® (ChFC® since 2001)** - The ChFC® program prepares the certificants to meet the advanced financial planning needs of individuals, professionals and small business owners. The ChFC® designation requires one to have three (3) years experience in the area of financial planning, successfully completed course work and exams, and to comply with The American College Code of Ethics and Procedures. To retain the ChFC® designation, certificate holders are required to meet rigid standards and complete 30 hours of continuing education every two (2) years.

**Chartered Advisor for Senior Living® (CASL® since 2006)** - The CASL® designation requires one to have achieved the experience requirements of the ChFC® designation or have three (3) years of experience dealing with the retirement years for the aging, and to successfully pass the examination process. To retain the CASL® certification, certificate holders are required to pay an annual certification fee, complete 15-hours of continuing education every two (2) years, and adhere to the ethical standards and eight canons of the American College of Financial Services' Code of Ethics.

#### Business Background

03/2025 - Present ..... Kris Lewicki & Associates, LLC ("KLA")

**Position:** Member & Chief Compliance Officer

01/2011 - 3/2025 ..... Kris Lewicki & Associates, LLC ("KLA")

**Position:** Managing Member & Chief Compliance Officer

01/2014 - 04/2019 .... Emerald Asset Advisors, LLC

**Position:** Investment Adviser Representative

01/2005 - 09/2011 .... LPL Financial, LLC

**Position:** Principal & Registered Representative

04/1996 - 01/2005 .... American Express Financial Advisors, Inc.

**Position:** Registered Representative

#### DISCIPLINARY INFORMATION

Mr. Lewicki has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or, personally ever been the subject of a criminal action.

<sup>1</sup> Certified Financial Planner Board of Standards, Inc. owns the certification marks CFP®, CERTIFIED FINANCIAL PLANNER™, and federally registered CFP (with flame logo), which it awards to individuals who successfully complete initial and ongoing certification requirements.

Kris Lewicki  
& Associates, LLC

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## Kris Lewicki & Associates, LLC

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### CONTACT INFORMATION

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[www.KrisLewickiandAssociates.com](http://www.KrisLewickiandAssociates.com)

## Kristof S. Lewicki, CFP®, ChFC®, CASL®

CRD#: 2714690

Year of Birth: 1959

### OTHER BUSINESS ACTIVITIES

Mr. Lewicki is not involved in any other business activities requiring disclosure. Full focus of his attention is directed to addressing your investment needs.

### ADDITIONAL COMPENSATION

Mr. Lewicki does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

### REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Lewicki has not been the subject of any arbitration claim, civil litigation, self-regulatory organization/administrative proceeding, or bankruptcy petition at any time during the past ten years.



## FORM ADV: PART 2B

### BROCHURE SUPPLEMENT



## Kris Lewicki & Associates, LLC

7401 Wiles Road, Suite 323  
Coral Springs, Florida 33067

### CONTACT INFORMATION

Tel: 954.866-3563  
Fax: 954.252.4131

[www.KrisLewickiandAssociates.com](http://www.KrisLewickiandAssociates.com)

### SUPERVISION

**Kristof S. Lewicki**  
Chief Compliance Officer

**Telephone:**  
954.324.3550  
**e-Mail:**  
[krist@klewickiassociates.com](mailto:krist@klewickiassociates.com)

Mr. Lewicki is responsible for the regulatory oversight of our advisory practice - ensuring our business activities are compliant with all federal and state regulations and that we are operating in compliance with our written policies and procedures.

His other duties include, but are not limited to: supervising investment activities, preparing planning documents, and performing client reviews and meeting to discuss investment options.

BROCHURE SUPPLEMENT  
DATED

28

**MARCH  
2025**

This Brochure Supplement provides information about Travis M. Lewicki that is an accompaniment to the Disclosure Brochure for our firm, Kris Lewicki & Associates, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Lewicki, you are welcome to contact us - our contact information is listed to the left.

Additional information about Kris Lewicki & Associates, LLC and Travis M. Lewicki are also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Travis M. Lewicki, CFP®

CRD#: 7112386

Year of Birth: 1990

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### Education

2013 - Florida Atlantic University: Bachelor of Arts in History  
2018 - Florida Atlantic University: Master of Business Administration in Finance

#### Licenses

FINRA Exams: Series 65 - Uniform Investment Adviser Law Examination  
Insurance: 2-15 License - Florida Life, Health & Variable Annuity Insurance (Unaffiliated)

#### Business Background

03/2025 - Present ..... Kris Lewicki & Associates, LLC ("KLA")  
Position: Managing Member  
04/2019 - 03/2025 .... Kris Lewicki & Associates, LLC ("KLA")  
Position: Member & Relationship Manager  
07/2017 - 04/2019 .... ADT, LLC  
Position: Recruitment Team Leader  
04/2015 - 07/2017 .... Riverland Staffing Solutions, LLC  
Position: Owner/Operator

### DISCIPLINARY INFORMATION

Mr. Lewicki has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or, personally ever been the subject of a criminal action.

### OTHER BUSINESS ACTIVITIES

Mr. Lewicki is licensed, as required by the State of Florida, as an Unaffiliated Insurance Agent to offer advice, counsel, and/or make recommendations on insurance related products on a fee basis.

As an Unaffiliated Insurance Agent, Mr. Lewicki can charge you a fee for analyzing insurance policies and/or comparing insurance products and how such policy will best benefit you. He can also recommend the insurance company, agency, and agent to underwrite the insurance policy - all for a fee. This arrangement, even though Mr. Lewicki does not receive or share any commissions, can still create potential conflicts with the incentive to: (i) analyze insurance products to generate additional fee income; and (ii) refer your business to those financial industry professionals that in turn refer potential clients to Kris Lewicki & Associates, LLC. Consequently, because of this situation, there is potential for divided loyalty and the objectivity of the advice rendered subjective and a disadvantage to you. Therefore, to ensure you understand the choices and risks you have receiving advice about insurance products on a fee basis, the following disclosures are provided to assist you with your decision:

- You are under no obligation to accept Mr. Lewicki's recommendation that he analysis any insurance products on your behalf.
- Should you choose to have Mr. Lewicki perform any insurance product review for a fee, you are under no obligation to have any professional Mr. Lewicki recommend write the insurance policy. You are free to choose any independent insurance agent and insurance company to purchase your insurance.

### ADDITIONAL COMPENSATION

Mr. Lewicki does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

### REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Lewicki has not been found liable in an arbitration claim, civil litigation, self-regulatory organization/administrative proceeding, or been the subject of a bankruptcy petition at any time during the past ten years.

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