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Fort Mitchell, KY 41017

This Brochure provides information about the qualifications and business practices of Focus On Success, LLC. If you have any questions about the contents of this Brochure, please contact us at 859-331-2010 or www.focusonsuccess.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.

Focus On Success, LLC. is a State Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you may use to determine whether to hire or retain them.

Additional information about Focus On Success, LLC. is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes.

Annual Update:

This section would include only ***specific material changes*** made to the ADV Part 2A Brochure dated March 2020 which was previously filed with the SEC and given to our clients. Certain sections of the Brochure have been updated; however, such changes have not been deemed to be material in nature and have therefore been omitted from the summary.

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ITEM 4 Advisory Business

I. Description of Focus On Success, LLC

Focus On Success (FOS), LLC, founded in 1989, is a Kentucky and Ohio Registered Investment Advisory firm. The firm's principal owner is James B. Corbett, ChFC, CLU, MSFS who also serves as its managing member. Focus On Success offers its services through individual investment advisory representatives ("IAR"). All investment advisory representatives of FOS are dually registered with Valmark Advisers, Inc. and Valmark Securities, Inc.

Focus On Success, LLC was created to offer financial planning to individual clients and provide investment advisory services to corporate retirement plans. A guideline for the fees will be covered later under this heading.

II. FINANCIAL PLANNING

The financial planning process requires clients to furnish certain records and documents to FOS for their review. These documents may include the Client's tax returns, current financial specifics including W-2s or 1099s, information on current retirement plans and insurance provided by the Client's employer, mortgage information, insurance policies, statements reflecting current investments in retirement and non-retirement accounts, copies of wills or trusts, and other documents that may be deemed pertinent and requested by FOS.

Upon receipts of these assets documents, FOS's Advisors will review the Client's current financial situation and make recommendations based on their expectations, investment objectives and investment time horizon. At the same time the Client's risk tolerance (or ability to live comfortably with risk in association with their investments) will be taken into account. A written plan will then be presented to the Client along with an outline of suggestions to improve their current financial situation as well as suggested steps to help them reach their financial goals.

Financial Planning may cover any or all of the following areas: retirement planning, education planning, asset allocation, estate planning, tax planning, and insurance needs analysis. The financial plan chosen by the client may be "comprehensive" or "modular" in structure. A comprehensive plan would focus on all areas listed that are pertinent to the client. A modular plan would focus on only one or two areas of particular interest such as retirement or education planning. Other areas of concern to the Client may be reviewed by FOS or outsourced to other experts for their review (only with prior approval of the Client). The financial plan may include specific financial and investment strategies including equity, fixed income and insurance products.

At no time is the client under any obligation to implement (with FOS or with any other firm) any or all of the suggestions as outlined in the financial plan. Implementation is solely at the Client's discretion.

It is the responsibility of the Client to notify FOS of any changes to their financial situation or objectives that may impact the focus of the financial plan.

Planning fees shall be payable in full upon completion of the services requested and presentation of the plan. Should the Client elect to pay any portion of the financial planning fee in advance, any prepaid fee will be refunded in the case of non-performance or termination. The average time period necessary to complete the plan is three months. The average client fee is \$2,500. FOS is available to discuss and review any questions relating to the financial plan within one year of execution of the contract date.

Financial planning fees do not include advisory fees, brokerage fees, and insurance commissions that may result of the financial planning process. It is common for clients that engage FOS for financial planning to seek the Asset Management Services offered through Valmark Advisers, Inc. and the insurance products offered through Executive Insurance, Inc.

As mentioned above, "IAR's" are dually registered with FOS and Valmark Advisers, Inc. All "IAR's" provide Asset Management Services through Valmark Advisers. "IAR's" are required to provide Form ADV Part 2 for Valmark Advisers to all clients and prospective clients which further define the fee and investment advisory services to be that will be offered by FOS.

III. Corporate Retirement Plans

Focus On Success partners with Plan Sponsors through the entire mission of managing retirement plans, using advanced tools and trademarked processes. The following services are provided to our retirement plan clients: Total cost analysis, fee transparency and benchmarking, preparation of investment policy statement, unbiased investment recommendations and monitoring ongoing assessment of fiduciary risks, including establishing a fiduciary checklist, plan design review, education and guidance to plan participants. These services are provided by Valmark Advisers, Inc.

Advisory fees are charged based upon the size of the retirement plan. These fees are paid out of the plan to Valmark Advisers, Inc. The ADV part 2A for Valmark Advisers, Inc. is provided to all current and prospective retirement plan sponsors.

IV. Assets under Management

Focus On Success Does not provide asset management services.

V. Educational and Business Standards for Investment Advisor Representatives

Each IAR of Focus On Success must be properly registered in each state in which they offer advisory services. Additionally, each IAR of FOS is dually registered as an IAR of Valmark Advisers, Inc. and a Registered Representative of Valmark's affiliate broker-dealer, Valmark Securities, Inc., and an associated person of the Financial Industry Regulatory Authority ("FINRA").

VI. Wrap Fees

Focus On Success does not offer any Wrap Fee programs.

VII. Selection of other Advisors

Focus On Success occasionally refers clients to Valmark Advisers for their asset management program.

ITEM 5 Fees and Compensation

The fee for a financial plan is based on the facts known at the start of engagement. The fee range for this service will be \$500 to \$5,000, and is dependent on the frequency of planned meetings and the complexity of the client's situation. Planning fees are negotiable. A Financial Planning Services Agreement will be completed to detail the work that will be done and the fee will be charged before work will be done by an Advisor.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

Planning fees shall be payable in full upon completion of the services requested and presentation of the plan. No fees in excess of \$500 will be collected more than six months in advance. Should Client elect to pay any portion of the financial planning fee in advance, any prepaid fee will be refunded in the case of nonperformance or termination.

ITEM 6 Performance-Based Fees

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

ITEM 7 Types of Clients

Focus On Success provides services to individuals, including through trusts, estates, 401(k) plans, and IRAs, high net-worth individuals, corporations or other businesses.

ITEM 8 Methods of Analysis, Investment Strategies and Risk of Loss

The IARs of Focus On Success provide investment advisory services through Valmark Advisers, Inc.

Methods of Analysis:

Valmark employs various methods of research when analyzing investment markets and available investment opportunities. Individual stock positions are rarely purchased within a Valmark advisory account. However, if individual stock positions are purchased, fundamental analysis is considered an appropriate format to review the merits of purchasing a stock. Fundamental analysis is a method of evaluating a security that entails attempting to measure its intrinsic value by examining related economic,

financial and other qualitative and quantitative factors. Fundamental analysis attempts to study everything that can affect the security's value, including macroeconomic factors, such as the overall economy and industry conditions, and company-specific factors, such as financial condition and management. Primarily, Valmark utilizes investment company products and similar products. When performing analysis on investment companies, Valmark attempts to verify the consistency and appropriateness of the investment strategy. Valmark has extensive experience in working with investment company products, specifically Exchange Traded Funds.

Investment Strategies:

Valmark primarily follows an investment policy of diversified model portfolios for clients. Across all advisory accounts, Valmark encourages its IAR's and clients to diversify assets across many different asset classes in an effort to help reduce portfolio volatility. While diversification* has been successful over time in many different types of investment cycles, there is no guarantee that diversifying assets will lead to lower volatility.

*Diversification – a portfolio strategy designed to reduce exposure to risk by combining a variety of investments, such as stocks, bonds, and real estate, which are unlikely to all move in the same direction. The goal of diversification is to reduce the risk in a portfolio. Volatility is limited by the fact that not all asset classes or industries or individual companies move up and down in value at the same time or at the same rate. Diversification helps to reduce both the upside and downside potential and allows for more consistent performance under a wide range of economic conditions.

Risk of Loss:

Investing in securities involves risk of loss that *Clients* should be prepared to bear. Equity based securities face the risk of lower valuations over time, as well as bankruptcy and total loss. Fixed income (debt) securities face the risk of default. Diversifying investments can help to reduce, but not eliminate, these risks. In particular situations, there may be circumstances that call for a concentrated position(s) inside of an account.

The Valmark strategy of diversifying assets in model portfolios does not involve trading daily. As such clients should not expect that Valmark will be able to correctly time and profit from daily investment market fluctuations.

Valmark makes use of ETFs extensively. While many ETFs are registered under the 1940 Investment Company Act as funds, many are instead registered as Unit Investment Trusts or similar vehicles. Clients should read the prospectus(es) or contact Valmark for additional information.

ITEM 9 Disciplinary Action

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Focus On Success or the integrity of Focus On Success management.

One of the IAR's of the firm was fined during 2010. In order to avoid the expense and time involved in pursuing an appeal, on August 12, 2010, James B. Corbett paid a fine of \$5,000.00 in an agreed order with the Commonwealth of Kentucky Department of Financial Institutions. The violation was in connection with the use of white out on two customer's forms.

The signature dates were changed on one form as an accommodation rather than requiring the customer to return to sign paperwork twice. Another customer application was updated and white out was used to correct an incorrectly marked check box, noting a correct registration type. Neither white out use affected the suitability of the transaction. Any and all use of white out for document corrections will be initialed by the customer and James Corbett in the future.

In addition, Focus On Success and James Corbett were named as parties in a civil litigation lawsuit. The customer is seeking \$50,000.00 in compensatory damages. Allegation(s) and a brief summary of events related to the allegations(s) including dates when activities leading to the allegation(s) occurred:

In March 2009 the customer invested \$50,000 in Mammoth Destiny LTD, a developmental gas drilling limited partnership. The customer was an experienced accredited investor with high net worth, low need for liquidity, and long term investment horizon with a tax sensitive, growth-oriented investment objective. In September 2010 the Mammoth General Partner and Well operator filed for bankruptcy. The firm hired outside counsel to investigate Mammoth's status, represent investors in the bankruptcy and file proofs of claim on their behalf. In exchange for the firm paying legal fees associated with this representation by counsel, the customer executed a full and final release of any and all claims on 6-15-2011. Through further legal analysis of the bankruptcy proceeding (in which a trustee was now appointed), the firm determined that continuing to expend resources for the representation of investors in the bankruptcy would not be productive. Rather than continue to expend feed, the firm extended an offer to return a portion of the customer's original investment. The customer declined that offer and requests return of this investment, and claims inadequate due diligence was performed in connection with the offering and that deceptive practices were used to obtain the signed release. The firm believes the claims are meritless and are in breach of the full and final release executed 6-15-2011. On October 30, 2013 the customers signed a confidential general release and settlement agreement.

Also, as a result of a customer investment in Mammoth Destiny, LTD, James B. Corbett was named in a written customer complaint allegation(s) and a brief summary of events related to the allegation(s) include these dates when activities leading to the allegation(s) occurred:

In December 2008 the customer invested \$100,000 in Mammoth Destiny LTD, a developmental gas drilling limited partnership. The customer was a sophisticated and experienced accredited investor with high net worth, low need for liquidity, and long term investment horizon with a tax sensitive, growth and income investment objective. In September 2010 the Mammoth General Partner and Well operator filed for bankruptcy. The firm hired outside counsel to investigate Mammoth's status, represent investors in the

bankruptcy and file proofs of claim on their behalf. In exchange for the firm paying legal fees associated with this representation by counsel, the customer executed a full and final release of any and all claims on 6-23-2011. Through further legal analysis of the bankruptcy proceeding (in which a trustee was now appointed), the firm determined that continuing to expend resources for the representation of investors in the bankruptcy would not be productive. Rather than continue to expend fees, the firm extended an offer to return a portion of the customer's original investment. The customer declined that offer and requests return of his investment, claiming he did not receive a prospectus, certificate, or performance information. Customer also states certain material facts about Mammoth were misrepresented and the risks were not disclosed. The firm believes that claims are meritless. Additionally, the claim is in breach of the full and final release executed 6-23-2011.

August 8, 2012 a confidential settlement agreement and release of all claims was reached between the claimant and Valmark Securities. It represents the compromise of disputed claims and there is no admission of liability by any party, and Valmark Securities and James. B. Corbett expressly denied liability.

James Corbett has not involved in or convicted of any crime in any court of law.

ITEM 10 Financial Industry Activities and Affiliations

The IARs of Focus On Success are dually registered with Valmark Advisers, Inc. (an SEC registered Investment Advisor) while also serving as registered representatives of Valmark Securities, Inc. (a FINRA and SIPC member broker-dealer). The time each advisor spends is equally divided between providing financial planning, investment advisory services, and life and disability insurance consultation.

As a Registered Representative of an affiliated broker dealer, Valmark Securities, Inc., IARs are eligible to receive normal commissions associated with securities sales. As an Independent Investment Adviser Representative of Valmark Advisers, Inc. IARs eligible to receive Advisory fees for the management of client assets.

IARs are also eligible to receive insurance commissions surrounding the sales of insurance products sold through the affiliated insurance agency, Executive Insurance Agency, Inc.

ITEM 11 Code of Ethics

All personnel and associated persons of Focus On Success strive to meet the highest ethical standards of behavior. Focus On Success has adopted a formal Code of Ethics Policy pursuant to SEC Rule 275.204A-1, a copy of which is available to Clients or prospective Clients upon request. The objective of this policy is to assure that all personnel and associated persons clearly understand the level of commitment that is required on behalf of the Clients of Focus On Success; to assure that Client interests always take priority over the interests of Focus On Success and its personnel; that personal securities transactions must avoid even the appearance of conflict with the interests of Clients; and that all applicable federal and state securities laws, including insider trading, are complied with.

Neither Focus On Success nor any related parties has a material interest in the securities recommended.

Item 12 Brokerage Practices

In general, IARs of FOS will recommend Valmark Securities, Inc. as the broker/dealer, and its clearing firms (Pershing), as the custodians for advisory accounts.

For most products sold to Clients, commissions will be listed in the prospectus and may not vary. But for some products, especially individual stocks or bonds, FOS's related persons may charge less than "Full" or "standard" commissions. In no case may they charge an additional commission. This may be done at the sole discretion of FOS and without the Client's approval. In addition, "load waived" mutual funds may also be sold, if allowed by prospectus. This means the "load" or "commission" is waived and the Client is not required to pay the full commission as stated in the prospectus. In most cases, this is only allowed for mutual funds purchased within an advisory account.

FOS may receive access to product research, services, technology and other education information to help them operate efficiently, grow their business and deliver exceptional service to clients. Valmark Securities, Pershing or other investment companies may provide some or all of these services. No Client is charged for these services and the information received may be used to benefit all clients of FOS and/or its related firms.

FOS understands and acknowledges that at all times it owes a fiduciary duty to clients to obtain best execution for their transactions. We believe that our relationships with these companies help us to execute securities transactions for clients in such a manner that the client's total cost in each transaction is as favorable as possible under prevailing market conditions.

All fees paid to FOS for advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus and will generally include a management fee, other fund expenses, and possibly a distribution fee. The fund may also impose sales charges. If so, the client may pay an initial or deferred sales charge. A client may invest in a mutual fund directly without the services of FOS. In that case, the client would not receive the services provided by FOS, which are designed, among other things, to assist the Client in determining which investment management programs and money managers are most appropriate to the client's financial situation and objectives. The client should review both the fees charged by the funds and the fees charged by FOS and the other investment advisers chosen to fully understand the total amount of fees to be by the client. Only then will the client be able to fully evaluate the advisory services being provided.

As registered representatives of Valmark Securities, Inc., the IARs of FOS may receive 12b-1 distribution fees, commissions and/or other compensation from investment companies for the placement of client funds into investment company shares or for the sale of other products (including insurance). In most cases, FOS will recommend products to the advisory clients that are available through Valmark Securities, or one of Valmark's related firms. They may receive commissions on these products, if such products are found to be suitable for such client objectives. This is fully disclosed to the client at the time of entering into an advisory contract.

While these individuals endeavor at all times to put the interest of the clients first as part of FOS's fiduciary duty, clients should be aware that the receipt of additional compensation itself creates an inherent conflict of interest, and may affect the judgment of these individuals making recommendations.

In addition, FOS, through its own account(s) or its associates' or principal's accounts, may buy (own) or sell the securities it recommends to clients. At no time is FOS in a position to affect the price of the security other than through that of normal market fluctuation.

At no time is the client under any obligation to implement (with FOS or with any other firm) any or all suggestions as outlined in the financial plan. Implementation is solely at the client's discretion. It is important to note that Client may find the same or similar services available from other investment advisers or brokers at the same, lower or higher fees than those offered by FOS.

The affiliations of FOS and its IARs with other firms disclosed in this ADV allow them to earn reasonable and customary commissions for products sold and cause no inherent conflict of interest. Clients are advised that they are not required to affect their securities transactions through Valmark Securities, Inc. and instead may use any broker/dealer or adviser they desire.

ITEM 13 Review of Accounts

Focus On Success will provide the preparation and periodic review of plans for continuing clients, or reviews of performance reports provided by other investment advisors. Accounts will be reviewed at least semi-annually and more frequently should market conditions or the client's financial situation warrant. Semi-annual or annual performance reports will be prepared by FOS and will be sent to client. Custodians for client's account(s) will also mail statements to the client at least quarterly.

ITEM 14 Client Referrals and Other Compensation

Focus On Success does not compensate for client referrals.

Focus On Success may receive access to product research, services, technology and other education information to help them operate efficiently, grow their business and deliver exceptional service to clients. Valmark Securities, Pershing or other investment companies may provide some or all of these services. No Client is charged for these services and the information received may be used to benefit all clients of Focus On Success and/or its related firms.

ITEM 15 Custody

Focus On Success does not have custody of client assets.

ITEM 16 Investment Discretion

Focus On Success accepts no discretionary authority over client accounts.

ITEM 17 Voting Client Securities

Focus On Success has not, nor will accept, authority to vote client securities.

ITEM 18 Financial Information

Registered investment advisers are required to provide you with certain financial information or disclosures about Focus On Success financial condition. Focus On Success has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. No fees in excess of \$500 will be collected more than six months in advance.

ITEM 19 Management

James Corbett, Principal

Educational Background and Business Experience

James B. Corbett

Date of Birth: 2/22/1955

Education:

- University of Pittsburgh, BSBA, Bachelor of Science, Economics
- American College, MSFS, Master of Science, Financial Services

Examinations and Professional Designations:

- Series 6 - Investment Company Products/Variable Contracts Limited Representative
- Series 7 – General Securities Representative
- Series 24 – General Securities Principal
- Series 63 - Uniform Securities Agent State law Exam
- CLU® – Chartered Life Underwriter
- ChFC® - Chartered Financial Consultant

Business Experience:

- Founder, Focus On Success. June 1990 to present

CLU® – Chartered Life Underwriter®

The CLU® designation is offered and recognized by the American College. Candidates must complete five core and three elective courses, and successfully pass a proctored exam for each course. Additionally, 3 years of full-time business experience within the 5 years preceding the awarding of the designation is required. Every 2 years, 30 hours of continuing education credits are required.

ChFC® - Chartered Financial Consultant®

The ChFC® designation is issued by the American College. To earn the professional designation, candidates must complete six core courses and two elective courses and successfully pass a proctored final exam for each course. Candidates must also have at least 3 years of full-time business experience within the 5 years preceding being awarded the designation. Every 2 years, 30 hours of continuing education credits are required.

MSFS® - Master of Science in Financial Planning®

The Master of Science in Financial Services (MSFS) is an accredited degree program. MSFS provides you with the tools needed to analyze, plan and implement integrated financial and life strategies. The candidate must have a Bachelor's degree from an accredited college or university. The candidate must also have relevant industry experience required.

Disciplinary Information

Registered Investment Advisers are required to disclose material facts regarding any investment related legal or disciplinary events, including issues involving criminal or civil actions, findings resulting from administrative proceeding before the SEC, a self-regulatory body or any other federal or state regulatory authority that would be material to your evaluation of each supervised person providing investment advice.

In order to avoid the expense and time involved in pursuing an appeal, on August 12, 2010, James. Corbett paid a \$5,000 fine in an agreed order with the Commonwealth of Kentucky Department of Financial Institutions. The violation was in connection with the use of white out on two customer's forms. The signature dates were changed on one form as an accommodation rather than requiring the customer to return to sign paperwork twice. Another customer application was updated and white out was used to correct an incorrectly marked check box, noting a correct registration type. Neither white out use affected the suitability of the transaction. Any and all use of white out for document corrections will be initialed by the customer and James Corbett in the future.

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