

Item 1 – Cover Page

Modern Capital Concepts, Inc.
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Date of Disclosure Brochure: December January 2024

This disclosure brochure provides information about the qualifications and business practices of Modern Capital Concepts, Inc. If you have any questions about the contents of this disclosure brochure, please contact Khloé Karova at 312-316-8120 or Khloé@moderncapitalconcepts.com. The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Modern Capital Concepts is also available on the Internet at www.adviserinfo.sec.gov. You can view the firm's information on this website by searching for Modern Capital Concepts, Inc. or the firm's CRD number 170396.

Financial planning offered through Modern Capital Concepts, Inc., a Registered Investment Advisor, not affiliated with LPL Financial, LLC.

*Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

Since the required annual amendment to our disclosure brochure was filed in March of 2023, no material changes were made to this document.

We will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time, we will also offer or provide a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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Item 4 – Advisory Business

Modern Capital Concepts is an investment adviser registered with the State of Illinois and is a corporation formed under the laws of the State of Illinois.

- Khloé Karova is the President and 100% owner of Modern Capital Concepts. Full details of education and business background are provided at *Item 19* of this Disclosure Brochure.
- Modern Capital Concepts filed was approved as a registered investment adviser in July 2014.

Introduction

The investment advisory services of Modern Capital Concepts are provided to you through an appropriately licensed and qualified individual who is an investment adviser representative of Modern Capital Concepts (referred to as your investment adviser representative throughout this brochure).

Description of Advisory Services

The following are descriptions of the primary advisory services of Modern Capital Concepts. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and Modern Capital Concepts before we can provide you the services described below.

Financial Planning & Consulting Services - Modern Capital Concepts offers financial planning and consulting services, which involve preparing a written financial plan and conducting individual consulting sessions covering specific or multiple topics. Modern Capital Concepts provides full written financial plans, which typically address the following topics: Investment Planning, Retirement Planning, Insurance Planning, Tax Planning, Portfolio Review, and Asset Allocation.

- **Investment Planning** – Modern Capital Concepts prepares an investment plan with a detailed review of the client’s overall investment objective, return requirements, risk tolerance, time horizon, liquidity needs, tax preference and unique circumstances. The investment plan will outline the investment philosophy, asset allocation plan, investment selection criteria and monitoring procedures. The plan is normally updated on a yearly basis unless there is a change in the client’s personal circumstance which would require an interim update. Investment planning can take anywhere between 6 to 40 hours depending upon the client’s profile and circumstances.
- **Insurance Planning** – As a part of a comprehensive financial plan Modern Capital Concepts will work with clients to determine the level of insurance needed to provide adequate protection to the client and their families. Insurance planning can take anywhere between 2 to 10 hours depending upon the client’s profile and circumstances.
- **Retirement Planning** – Modern Capital Concepts determines retirement income goals and gathers information about potential sources of retirement. Modern Capital Concepts creates a unified and comprehensive retirement plan covering assets, income, taxation, inheritance and risk management. A long-term asset management plan is structured considering economic environment and inflationary conditions, tax minimization strategy, uncertainty and market

volatility. Retirement planning services include research, financial modeling and mathematical simulation to identify adequacy of client's investment to attain retirement readiness, and to clarify strategic choices and actions. Retirement planning can take anywhere between 6 to 40 hours depending upon the client's profile and circumstances.

- **Tax Planning** – Modern Capital Concepts works with third party tax / accounting advisor(s) to align financial goals with tax efficiency planning. Tax planning would encompass many different aspects e.g. selection of investment options and types of retirement plans, timing of income and capital growth as well as tax lot selection for investment transactions within client's portfolio. Tax planning can take anywhere between 6 to 40 hours depending upon the client's profile and circumstances.
- **Portfolio Review and Asset Allocation** – Modern Capital Concepts researches clients' existing portfolios and underlying investments to determine the asset class mix, return profile and risk characteristics. Modern Capital Concepts also determines broad asset allocation objectives based on the Investment Plan. An Efficient Frontier is constructed to develop an optimized portfolio based on the constraints indicated in the plan and underlying investments (e.g. stocks, bonds, ETFs, mutual funds etc.) are selected using quantitative screens and qualitative review. Modern Capital Concepts also analyzes return, risk and modern portfolio statistics and runs mathematical simulation, wherever necessary, to identify the adequacy of the portfolio against the client's investment objectives and risk tolerance. Portfolio Review and asset allocation can take anywhere between 4 to 60 hours depending upon the client's profile and circumstances.

In addition to general financial planning services Modern Capital Concepts offers the following customized services package service options:

Financial Check-Up

A limited service offering for clients that need assistance in the following areas:

- Cash Flow and Debt Management
- Investment Education
- Retirement Planning
- College Savings/Financial Aid Strategies
- Insurance Needs Analysis

Personalized Financial Strategy

A planning option for clients in need of more extensive assistance in the following areas

- Cash Flow and Debt Management
- Investment Education
- Retirement Planning
- College Savings/Financial Aid Strategies
- Insurance Needs Analysis
- Tax and Estate Planning
- Divorce Financial Analysis

- Small Business/Start Up Advisory Services

When providing financial planning and consulting services, the role of Modern Capital Concepts is to find ways to help the client understand their overall financial situation and set financial objectives. Written financial plans prepared by Modern Capital Concepts do not include specific recommendations of individual securities.

Modern Capital Concepts also offers consultations to all clients in order to discuss financial planning issues when the client does not need a written financial plan. Modern Capital Concepts' Financial Consulting Services can cover any topic of interest or concern requested by clients including divorce financial analysis, portfolio reviews, insurance needs, retirement questions or as needed investment review. Financial Consulting engagements may take anywhere between one and 10 hours depending upon the needs of the client.

Modern Capital Concepts offers a one-time consultation, which covers mutually agreed upon areas of concern related to investments or financial planning. Modern Capital Concepts also offers "as-needed" consultations, which are limited to consultations in response to a particular investment or financial planning issue raised or request made by the client. Under an "as-needed" consultation, it will be incumbent upon the client to identify those particular issues for which they are seeking advice or consultation.

Modern Capital Concepts' financial planning and consulting services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility for determining whether to implement financial planning and consulting recommendations.

Workplace Wellness Program

Modern Capital Concepts offers consultation services to corporations and other entities under our Workplace Wellness Program.

Financial Wellness Lunch and Learn

The Financial Lunch and Learn provides 1 hour group seminar followed by 3 hours one-on-one mini counseling sessions. Program is free each year for Modern Capital Concepts 401(k) plan clients.

Each session covers the following topics:

- Identifying goals, overcoming obstacles and techniques to reduce financial stress
- Investment education: how does the stock market work, how to do research, importance of asset allocation and risk management
- College saving, financial aid, student loan strategies
- Saving for retirement

Business Brain Trust

The Business Brain Trust is a mastermind for experienced professionals and meets monthly in

Chicago. Remote members participate via Zoom. Members bring up topics for discussion. Topics include sales pitch practice, pricing, social media, sales strategies, and branding. There is no cost to Modern Capital Concepts' asset management or financial planning clients on the quarterly retainer.

Personal Financial Planning

Individuals Under 35 are eligible to participate 30-minute meeting via Zoom or in person each month.

Available topics are:

- Cash Flow and Debt Management, Student Loans
- Investment Education
- 401(k), health care, and employee benefits
- Planning for Retirement
- Paying for College / Financial Aid
- Insurance Needs Analysis
- Tax and Estate Planning
- Buying a Home
- Emotions and Money
- Personal Branding and Salary Negotiation
- Divorce Financial Analysis

General Consulting Services

Modern Capital Concepts will offer consulting services based upon the needs of each corporate client.

Seminars

Modern Capital Concepts has established the doing business name of WealthEquity sole for the use in marketing our seminars which cover areas such as financial planning, retirement planning, estate planning, college planning, divorce financial planning and charitable planning. Seminars are always offered on an impersonal basis and do not focus on the individual needs of participants. Seminars may be held in restaurants, hotel meeting spaces or other appropriate meeting locations. Seminars will typically involve individual financial planning and investment topics that would be of interest to individuals and small business owners.

Workshops

Modern Capital Concepts offers educational, informative and motivational workshops to the public as well as to associations, family foundations and employers. Workshops are always offered on an impersonal basis and do not focus on the individual needs of the participants.

Limits Advice to Certain Types of Investments

Modern Capital Concepts provides investment advice on the following types of investments:

- Mutual Funds
- Exchange Traded Funds (ETFs)
- Exchange-listed Securities
- Corporate Debt Securities
- Variable Annuities
- Variable Life Insurance
- Options Contracts on Securities
- Municipal bonds

Although Modern Capital Concepts generally provides advice only on the products previously listed, we reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

It is not our typical investment strategy to attempt to time the market, but we may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. Modern Capital Concepts may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)

Tailor Advisory Services to Individual Needs of Clients

Our services are always provided based on the individual needs of each client. We work with each client on a one-on-one basis through interviews and questionnaires to determine the client's investment objectives and suitability information.

Client Assets Managed by Modern Capital Concepts

Modern Capital Concepts specializes in providing Financial Planning and Consulting Services to clients and has no assets under management to report.

Item 5 – Fees and Compensation

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding the firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be outlined in the agreement between you and Modern Capital Concepts.

Financial Planning & Consulting Services

Fees charged for financial planning and consulting services are negotiable based upon the type of client, the services requested, the complexity of the client's situation, the composition of the client's account,

other advisory services provided and the relationship of the client and the investment adviser representative. The following are the fee arrangements available for financial planning and consulting services offered by Modern Capital Concepts.

Fees for Financial Planning and Consulting Services

Modern Capital Concepts provides financial planning services under an hourly fee basis, a fixed quarterly fee arrangement or an asset based fee basis. The firm's basic hourly fee charge for financial planning services is \$450 per hour however the firm offers a variety of financial planning service offerings:

Financial Check-Up

Clients selecting the Financial Check-Up option will be charged an hourly fee of \$800 for the first 2 hours of service for clients that need assistance with:

- Cash Flow and Debt Management
- Investment Education
- Retirement Planning
- College Savings/Financial Aid Strategies
- Insurance Needs Analysis

Client exceeding the 2 initial hours will be charged at a rate of \$450 per hour for each hour in excess of two.

Personalized Financial Strategy

Clients selecting the Personal Financial Strategy will be charged a fixed quarterly fee of \$2,000 per three-month period for clients that need more extensive help with:

- Cash Flow and Debt Management
- Investment Education
- Retirement Planning
- College Savings/Financial Aid Strategies
- Insurance Needs Analysis
- Tax and Estate Planning
- Divorce Financial Analysis
- Small Business/Start Up advisory services

Before commencing either of the financial planning and consulting services, Modern Capital Concepts provides an estimate of the approximate hours needed to complete the requested financial planning and consulting services. If Modern Capital Concepts anticipates exceeding the estimated amount of hours required, Modern Capital Concepts will contact you to receive authorization to provide additional services. You will pay in advance a mutually agreed upon retainer that will be available for Modern Capital Concepts to bill hourly fees against for financial planning services; however, under no circumstances will Modern Capital Concepts require you to pay fees more than \$500 more than six months in advance. The standard billing dates and events of Modern Capital Concepts are the following: (1) the first business day of each month; (2) the date when incurred hourly fees and expenses will cause the retainer balance to be depleted to zero; (3) the date or thereafter that Modern Capital Concepts substantially provides the

agreed upon services; and (4) the date the engagement is terminated by either you or Modern Capital Concepts. Upon presentment of the invoice to you, Modern Capital Concepts will deduct the hourly fees due Modern Capital Concepts against your current retainer balance and you are required to pay immediately Modern Capital Concepts any outstanding balance of hourly fees due.

The financial planning and consulting services terminate upon either party providing the other party with written notice of termination.

You may terminate the financial planning and consulting services within five (5) business days of entering into an agreement with Modern Capital Concepts without penalty or fees due. If you terminate the financial planning and consulting services after five (5) business days of entering into an agreement, you will be responsible for immediate payment of any financial planning and consulting services performed by Modern Capital Concepts prior to the receipt by Modern Capital Concepts of your notice. For financial planning and consulting services performed by Modern Capital Concepts under an hourly arrangement, you will pay Modern Capital Concepts for any hourly fees incurred at the rates described above. In the event that there is a remaining balance of any fees paid in advance after the deduction of fees from the final invoice, those remaining proceeds will be refunded by Modern Capital Concepts to you.

Fees For Workplace Wellness Program

Financial Wellness Lunch and Learn

A fixed fee of \$3,000 per Financial Wellness program provided to clients

Business Brain Trust

A fee of \$250 per month is charged for our Business Brain Trust services. There is a minimum six-month commitment.

Personal Financial Planning

A fee of \$125 per month is charged for our Personal Financial Planning Services. There is a minimum 12 month commitment for this service.

General Consulting Services

General consulting is billed at a flat rate of \$2,000 for each day services are provided.

Other Fee Terms for Financial Planning & Consulting Services

You may pay the investment advisory fees owed for the financial planning services by submitting payment directly (for example, by check).

You should notify Modern Capital Concepts within ten (10) days of receipt of an invoice if you have questions about or dispute any billing entry.

To the extent Modern Capital Concepts engages an outside professional (i.e. attorney, independent investment adviser or accountant) while providing financial planning and consulting services to you, Modern Capital Concepts will be responsible for the payment of the fees for the services of such an outside professional, and you will not be required to reimburse Modern Capital Concepts for such payments. To the extent that you personally engage such an outside professional, you will be responsible for the payment of the fees for the services of such an outside professional, and Modern Capital Concepts will not be required to reimburse Client for such payments. Fees for the services of an outside professional (i.e. attorney, independent investment adviser or accountant) will be in addition to and separate from the fees charged by Modern Capital Concepts, and you will be responsible for the payment of the fees for the services of such an outside professional. In no event will the services of an outside professional be engaged without your express approval.

All fees paid to Modern Capital Concepts for services are separate and distinct from the commissions, fees and expenses charged by insurance companies associated with any disability insurance, life insurance and annuities subsequently acquired by you. If you sell or liquidate certain existing securities positions to acquire any insurance or annuity, you may also pay a commission and/or deferred sales charges in addition to the financial planning and consulting fees paid to Modern Capital Concepts and any commissions, fees and expenses charged by the insurance company for subsequently acquired insurance and/or annuities.

If you elect to have your investment adviser representative, in his or her separate capacity as an insurance agent, implement the recommendations of Modern Capital Concepts, your investment adviser representative at his or her discretion may waive or reduce the investment advisory fee charged for these services by the amount of the commissions received by your investment adviser representative as an insurance agent. Any reduction of the investment advisory fee will not exceed 100% of the insurance commission received.

All fees paid to Modern Capital Concepts 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 mutual fund's prospectus. These fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge.

If you retain Modern Capital Concepts to implement the recommendations provided under this service, Modern Capital Concepts may recommend load or no-load mutual funds that charge you 12(b)-1 fees. Your investment adviser representative may receive a portion of these 12(b)-1 fees in his or her separate capacity as a registered representative of a securities broker-dealer. The receipt of 12(b)-1 fees could represent an incentive for Modern Capital Concepts or your investment adviser representative to recommend mutual funds with 12(b)-1 fees or higher 12(b)-1 fees over mutual funds with no 12(b)-1 fees or lower 12(b)-1 fees and therefore creates a conflict of interest.

All fees paid to Modern Capital Concepts for financial planning and consulting services are separate and distinct from the commissions charged by a broker-dealer or asset management fees charged by an investment adviser to implement such recommendations.

If you elect to have your investment adviser representative, in his or her separate capacity as a registered representative, implement the recommendations of Modern Capital Concepts, your investment adviser representative at his or her discretion may waive or reduce the investment advisory fee charged by the

amount of the commissions received as a registered representative. Any reduction of the investment advisory fee will not exceed 100% of the commission received as a registered representative.

If you elect to implement the recommendations of Modern Capital Concepts through our other investment advisory programs, Modern Capital Concepts may waive or reduce a portion of the investment advisory fees for such investment advisory program(s). Any reduction will be at the discretion of your investment adviser representative and disclosed to you prior to contracting for additional investment advisory services.

It should be noted that lower fees for comparable services may be available from other sources.

Seminars

The fees charged for attending seminars will vary depending upon the expenses incurred for the seminar presentation. The fees may range between \$25 and \$250 per participant depending upon the expenses incurred. If you cancel prior to attending the seminar, a complete refund of any fee paid in advance is made. In addition, if Modern Capital Concepts is hired by larger groups, such as corporations, we reserve the right to charge fees to cover the expenses incurred for presenting the seminars. In this case, all fees and payment provisions will be fully disclosed to you prior to the seminar being presented.

Workshops

Modern Capital Concepts may either provide the workshops for free or charge a fee. If participants are charged a fee it will vary depending upon the expenses incurred for the workshop presentation. We may require reimbursement for workshop expenses. If a fee is charged, we will provide payment terms and cancellation procedures to anticipated participants.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item 6* is not applicable to this Disclosure Brochure because Modern Capital Concepts does not charge or accept performance-based fees.

Item 7 – Types of Clients

Modern Capital Concepts generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals
- Corporations or business entities other than those listed above

You are required to execute a written agreement with Modern Capital Concepts specifying the particular advisory services in order to establish a client arrangement with Modern Capital Concepts.

Minimum Investment Amounts Required

There are no minimum investment amounts or conditions required for establishing a relationship with Modern Capital Concepts. However, all clients are required to execute an agreement for services in order to establish a client arrangement with Modern Capital Concepts.

The minimum fee generally charged for financial planning services provided on an hourly basis is \$450.

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

Methods of Analysis

Modern Capital Concepts uses the following methods of analysis in formulating investment advice:

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong and could therefore lead to an unfavorable investment decision.

Technical – This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy

the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

There are risks involved in using any analysis method.

To conduct analysis, Modern Capital Concepts gathers information from financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses and filings with the SEC, and company press releases.

Investment Strategies

Modern Capital Concepts uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Margin transactions. When an investor buys a stock on margin, the investor pays for part of the purchase and borrows the rest of the purchase price from a brokerage firm. For example, an investor may buy \$5,000 worth of stock in a margin account by paying for \$2,500 and borrowing \$2,500 from a brokerage firm. Clients cannot borrow stock from Modern Capital Concepts.

Option writing including cover options, uncovered options or spreading strategies. Options are contracts giving the purchaser the right to buy or sell a security, such as stocks, at a fixed price within a specific period of time.

Primarily Recommend One Type of Security

Modern Capital Concepts does not primarily recommend one type of security to clients. Instead, we recommend any product that may be suitable for each client relative to that client's specific circumstances and needs.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, the firm is unable to represent, guarantee, or even imply that the services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities, as described below:

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investments with the firm varies with the success and failure of its investment strategies, research, analysis and determination of portfolio securities. If investment strategies do not produce the expected returns, the value of the investment will decrease.

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of the business or its integrity.

Item 10 – Other Financial Industry Activities and Affiliations

Modern Capital Concepts is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

Khloé Karova is an independent registered investment registered adviser and only provides investment advisory services. She is not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure. However, while she does not sell products or services other than investment advice, our investment advisor representatives may sell other products or provide services outside of their role as investment adviser representatives with us.

Registered Representative of a Broker-Dealer

Our investment advisor representatives are also registered representatives of LPL Financial LLC, a securities broker-dealer. You may work with your investment adviser representative in his or her separate capacity as a registered representative of LPL Financial LLC. When acting in his or her separate capacity as a registered representative, your investment adviser representative may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to you. As such, your investment adviser representative may suggest that you implement investment advice by purchasing securities products through a commission-based brokerage account in addition to or in lieu of a fee-based investment-advisory account. This receipt of commissions creates an incentive to recommend those products for which your investment adviser representative will receive a commission in his or her separate capacity as a registered representative of a securities broker dealer. Consequently, the objectivity of the advice rendered to you could be biased.

You are under no obligation to use the services of our investment adviser representatives in this separate capacity or to use LPL Financial LLC and can select any broker/dealer you wish to implement securities transactions. If you select our investment adviser representatives to implement securities transactions in their separate capacity as registered investment adviser representatives, they must use LPL Financial LLC. Prior to effecting any such transactions, you are required to enter into a new account agreement with LPL Financial LLC. The commissions charged by LPL Financial LLC may be higher or lower than those charged by other broker/dealers. In addition, the registered investment adviser representatives may also receive additional ongoing 12b-1 fees for mutual fund purchases from the mutual fund company during the period that you maintain the mutual fund investment.

Dually Registered as an Investment Adviser Representative

The investment adviser representatives of Modern Capital Concepts are also licensed as investment adviser representatives with LPL Financial LLC. Modern Capital Concepts and LPL Financial LLC are not

affiliated. Through LPL Financial LLC, the investment advisor representatives provide asset management services as well as referrals to sub-advisors. They earn advisory fees when providing these services through LPL Financial LLC. Therefore, you could receive advisory services from one individual acting as an investment adviser representative on behalf of two separate registered investment advisors. If the investment advisor representatives of Modern Capital Concepts provide services to you, you will be given the disclosure brochure of LPL Financial LLC describing the services provided, fees charged and other information. You are encouraged to read and review the disclosure brochures for both Modern Capital Concepts and LPL Financial LLC and direct questions to your representative.

Insurance Agent

You may work with your investment adviser representative in his or her separate capacity as an insurance agent. When acting in his or her separate capacity as an insurance agent, the investment adviser representative may sell, for commissions, general disability insurance, life insurance, annuities, and other insurance products to you. As such, your investment adviser representative in his or her separate capacity as an insurance agent, may suggest that you implement recommendations of Modern Capital Concepts by purchasing disability insurance, life insurance, annuities, or other insurance products. This receipt of commissions creates an incentive for the representative to recommend those products for which your investment adviser representative will receive a commission in his or her separate capacity as an insurance agent. Consequently, the advice rendered to you could be biased. You are under no obligation to implement any insurance or annuity transaction through your investment adviser representative.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

An investment adviser is considered a fiduciary and has a fiduciary duty to all clients. Modern Capital Concepts has established a Code of Ethics to comply with the requirements of the securities laws and regulations that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. Modern Capital Concepts' Code of Ethics covers all individuals that are classified as "supervised persons". All employees, officers, directors and investment adviser representatives are classified as supervised persons. Modern Capital Concepts requires its supervised persons to consistently act in your best interest in all advisory activities. Modern Capital Concepts imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm's fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of Modern Capital Concepts. If you wish to review the Code of Ethics in its entirety, you should send a written request and upon receipt of your request, a copy of the Code of Ethics will be promptly provided to you.

Affiliate and Employee Personal Securities Transactions Disclosure

Modern Capital Concepts or associated persons of the firm may buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a potential conflict of interest. It is the express policy of Modern Capital Concepts that all persons associated in any manner with the firm must place clients' interests ahead of their own when implementing personal investments. Modern Capital Concepts and its associated persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with the firm unless the information is also available to the investing public upon reasonable inquiry.

The firm is now and will continue to be in compliance with applicable state and federal rules and regulations. To prevent conflicts of interest, Modern Capital Concepts has developed written supervisory procedures that include personal investment and trading policies for its investment advisor representatives, employees and their immediate family members (collectively, associated persons):

- Associated persons cannot prefer their own interests to that of the client.
- Associated persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts.
- Associated persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment, unless that information is also available to the investing public upon reasonable inquiry.
- Associated persons are prohibited from purchasing or selling securities of companies in which any client is deemed an "insider".
- Associated persons are discouraged from conducting frequent personal trading.
- Associated persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted to the Chief Compliance Officer of Modern Capital Concepts.

Any associated person not observing our policies is subject to sanctions up to and including termination.

Item 12 – Brokerage Practices

Clients are under no obligation to act on the financial planning recommendations of Modern Capital Concepts. If the firm assists in the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible. Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back office services, technology, regulatory compliance assistance, research and analytic services)

- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

Modern Capital Concepts exercises reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back office services, technology and pricing of services offered.

Broker/Dealer Affiliation (LPL Financial)

If you wish to implement our advice you are free to select any broker you wish. If you wish to have Khloé Karova implement any advice in her separate capacity as a registered representative LPL Financial, LLC is used. Khloé Karova is a registered representative of LPL Financial, LLC is required to use the services of LPL when acting in this capacity. LPL has a wide range of approved securities products for which it performs due diligence prior to selection. LPL's registered representatives are required to adhere to these products when implementing securities transactions through LPL. Commissions charged for these products may be higher or lower than commissions clients may be able to obtain if transactions were implemented through another broker/dealer.

Because Khloé Karova is also a registered representative of LPL, LPL provides her with compliance support, back-office operational, technology and other administrative support.

If you wish to implement any of the advice or recommendations made by Khloé Karova through any of the programs described in this Disclosure Brochure, LPL will be used as the broker/dealer and/or custodian. LPL will be the primary broker/dealer and custodian recommended due to the relationship with LPL. Modern Capital Concepts recommends broker/dealers and custodians that provide services in a manner and at a cost that will allow the firm to meet the duty of best execution. However, Khloé Karova is limited in the broker/dealer or custodians that she is allowed to use due to the relationship with LPL. LPL may limit or restrict the broker/dealer or custodial platforms for its registered representatives that are also independently licensed due to its duty to supervise the transactions implemented by these individuals.

While there is no direct linkage between the investment advice given to you and our recommendation of LPL, economic benefits may be provided by LPL that are not provided if you select another broker/dealer or account custodian. These benefits may include:

- Negotiated costs for transaction implementation
- A dedicated trade desk that services LPL Financial participants exclusively
- A dedicated service group and an account services manager dedicated to our accounts
- Access to a real-time order matching system
- Electronic download of trades, balances and position information
- Access, for a fee, to an electronic interface with the account custodian's software
- Duplicate and batched client statements, confirmations and year-end reports

Please also see *Item 5, Fees and Compensation*, for additional information about advisory services and implementing recommendations.

Soft Dollar Benefits

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

Modern Capital Concepts does not have a soft dollar agreement with a broker-dealer or a third-party.

Item 13 – Review of Accounts

Account Reviews and Reviewers

We recommend that financial planning clients have their plan reviewed on an annual basis. Modern Capital Concepts does not produce or deliver account statements. Clients will receive statements at least quarterly from the investment company, broker/dealer, clearing firm or money manager where their account is maintained. Our financial planning services terminate upon the presentation of the written plan. Our financial planning and consulting services do not include monitoring the investments of your account(s), and therefore, there is no ongoing review of your account(s) under such services.

Statements and Reports

You are encouraged to make appointments with Modern Capital Concepts to review your reports, answer questions and to discuss any changes or rebalancing we think is warranted.

You are encouraged to always compare any reports or statements provided by me against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

Item 14 – Client Referrals and Other Compensation

Modern Capital Concepts does not directly or indirectly compensate any person for client referrals. The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. Modern Capital Concepts receives no other forms of compensation in connection with providing investment advice.

Please see Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation.

We may from time to time receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are typically the result of informal expense sharing arrangements in which product sponsors may underwrite costs incurred for marketing such as client appreciation events, advertising, publishing, and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are

typically made by those sponsors for which sales have been made or for which it is anticipated sales will be made. This creates a conflict of interest in that there is an incentive to recommend certain products and investments based on the receipt of this compensation instead of what is in the best interest of our clients. Modern Capital Concepts attempts to control for this conflict by always basing investment decisions on the individual needs of clients.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented. According to this definition, Modern Capital Concepts does not have custody of client funds or securities.

Item 16 – Investment Discretion

Since Modern Capital Concepts solely provides Financial Planning and Consulting services the firm does not maintain discretionary trading authorization over your Account.

Item 17 – Voting Client Securities

Proxy Voting

Modern Capital Concepts does not vote proxies on behalf of Clients. The firm has determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; Modern Capital Concepts will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

Item 18 – Financial Information

This *Item 18* is not applicable to this brochure. Modern Capital Concepts does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, Modern Capital Concepts is not required to include a balance sheet for the most recent fiscal year. Modern Capital Concepts is not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Modern Capital Concepts has not been the subject of a bankruptcy petition at any time.

Item 19 – Requirements for State-Registered Advisers

Executive Officer and Management Personnel

Khloé Karova

Post-Secondary Educational Background:

Northwestern University, Bachelor of Arts: Art History: 1994

Northwestern University, Bachelor of Arts: Organizational Behavior: 2002

University of Chicago: Booth School of Business, Master of Business Administration: 2006

Northwestern University, Certified Financial Planner: 2009

Business Background:

Modern Capital Concepts, President and Owner 12/2013 to Present

LPL Financial, Registered Representative and Investment Adviser Representative, 12/2013 to Present

Edward Jones, Financial Adviser, 11/2009 to 12/2013

Northwestern University, Full-time Student, 01/2009 to 11/2009

Self-employed, 09/2008 to 01/2009

Lehman Brothers, Strategic Planning Manager, Equity Trading, 11/1998 to 09/2008

Other Business Activities

See Item 10 – Other Financial Industry Activities and Affiliations.

No Performance Based Fees

As previously disclosed in *Item 6*, Modern Capital Concepts does not charge or accept performance based fees.

No Arbitrations

Modern Capital Concepts or any of its associated persons have not been the subject of any client arbitrations or similar legal disputes.

Business Continuity Plan

Modern Capital Concepts has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions will impact the ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions.

The continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and

resume business operations, to protect books and records, and to allow clients to continue transacting business.

The plan includes the following:

- Alternate locations to conduct business;
- Hard and electronic back-ups of records;
- Alternative means of communications with employees, clients, critical business constituents and regulators; and
- Details on the firms' employee succession plan

The business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.

Customer Privacy Policy Notice

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

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

To conduct regular business, Modern Capital Concepts may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to Modern Capital Concepts
- Information about the client's transactions implemented by Modern Capital Concepts or others
- Information developed as part of financial plans, analyses or investment advisory services
- To administer, manage, service, and provide related services for client accounts, it is necessary for Modern Capital Concepts to provide access to client information within the firm and to nonaffiliated companies with whom Modern Capital Concepts has entered into agreements with. To provide the utmost service, Modern Capital Concepts may disclose the information below regarding clients and former clients as necessary, to companies to perform certain services on Modern Capital Concepts' behalf.

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

Since Modern Capital Concepts shares nonpublic information solely to service client accounts, Modern Capital Concepts does not disclose any nonpublic personal information about Modern Capital Concepts' clients or former clients to anyone, except as permitted by law. However, Modern Capital Concepts may also provide client information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that Modern Capital Concepts has a change to its client privacy policy that would allow it to disclose non-public information not covered under applicable law, Modern Capital Concepts will allow its clients the opportunity to opt out of such disclosure.

FORM ADV PART 2B BROCHURE SUPPLEMENT - Khloé Karova

Item 1 – Cover Page

Khloé Karova
Modern Capital Concepts, Inc.
2055 N. Spaulding Ave.
Chicago, IL 60647
312-316-8120

www.moderncapitalconcepts.com

Date of Supplement: January 2024

This brochure supplement provides information about Khloé Karova that supplements the Modern Capital Concepts, Inc. disclosure brochure. You should have received a copy of that brochure. Please contact Khloé Karova at 312-316-8120 or at khloe@moderncapitalconcepts.com if you did not receive Modern Capital Concepts' brochure or if you have any questions about the contents of this supplement.

Additional information about Khloé Karova is available on the SEC's website at www.adviserinfo.sec.gov.

Financial planning offered through Modern Capital Concepts, Inc., a Registered Investment Advisor, not affiliated with LPL Financial, LLC.

Item 2 – Educational Background and Business Experience

Khloé Karova

Born 1972, CRD # 5175149

Post-Secondary Educational Background:

Northwestern University, Bachelor of Arts: Art History: 1994
Northwestern University, Bachelor of Arts: Organizational Behavior: 2002
University of Chicago: Booth School of Business, Master of Business Administration: 2006
Northwestern University, Certified Financial Planner: 2009

Business Background:

Modern Capital Concepts, President and Owner 12/2013 to Present
LPL Financial, Registered Representative and Investment Adviser Representative, 12/2013 to Present
Edward Jones, Financial Adviser, 11/2009 to 12/2013
Northwestern University, Full-time Student, 01/2009 to 11/2009
Self-employed, 09/2008 to 01/2009
Lehman Brothers, Strategic Planning Manager, Equity Trading, 11/1998 to 09/2008

Professional Designations

Certified Financial Planner (CFP)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.
- Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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.

CFP Acknowledgment: (ADVISOR) acknowledges his responsibility as a CFP® Certificant to adhere to the standards that have been established in the CFP Board's Standards of Professional Conduct. If you become aware that (ADVISOR)'s conduct may violate the Standards of Professional Conduct, you may file a complaint with the CFP Board at www.CFP.net/complaint.

Code of Ethics for CFP

The following disclosure has been included in the COE section of the 2A.

In addition to abiding by our Code of Ethics, some of our investment advisor representatives are Certified Financial Planners™ (CFP®) and also abide by the Code of Ethics and Responsibility Code of the Certified Financial Planner™ Board of Standards, Inc. The Code of Ethics and Responsibility Code requires CFP® designees to not only comply with all applicable laws and regulations but to also act in an ethical and professional responsible manner in all professional services and activities. The principles guiding CFP® designees are:

- Integrity
- Objectivity
- Competence (in providing services and maintaining knowledge and skills to do so)
- Fairness (to clients, principals, partners and employers and disclosing any conflicts of interest in providing services)
- Confidentiality (keeping all client information confidential without the specific client consent unless in response to legal process or in defense of charges of wrongdoing or civil dispute)
- Professionalism
- Diligence

You can obtain a copy of the Code of Ethics and Responsibility Code by requesting a copy from one of our investment advisor representatives.

Item 3 – Disciplinary Information

Khloé Karova has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of a Broker-Dealer

Khloé Karova is separately licensed as a registered representative with LPL Financial, LLC, a registered securities broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC). When acting in her separate capacity as a registered representative of LPL Financial, LLC, Khloé Karova may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, Khloé Karova may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based LPL Financial, LLC account.

The receipt of commissions creates an incentive for Khloé Karova to recommend those products for which she will receive a commission. Consequently, the objectivity of the advice rendered to clients could be biased. Khloé Karova controls for this potential conflict of interest by discussing with clients the advantages and disadvantages of establishing a fee-based account through Modern Capital Concepts versus establishing a commission-based account through LPL Financial, LLC. Modern Capital Concepts does not require its advisor representatives to encourage clients to implement investment advice through LPL Financial, LLC.

Khloé Karova does not earn commissions in fee-based accounts.

Khloé Karova will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. 12b-1 fees come from fund assets, therefore, indirectly from client assets. The receipt of such fees could represent an incentive for Khloé Karova to recommend funds with 12b-1 fees over funds that have no fees or lower fees. Typically, Khloé Karova will receive 12b-1 fees only in commission-based brokerage accounts. For ERISA accounts, there is an offset for any amount of 12b-1 fees. In such a situation, Khloé Karova discusses with clients the selection of a 12b-1 or other trail paying mutual funds. LPL Financial, LLC maintains records of all 12b-1 fee payments to Khloé Karova which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Modern Capital Concepts or LPL Financial, LLC. However, if a client does not choose to accept Khloé Karova's advice or decides not to establish an account through LPL Financial, LLC, Khloé Karova may not be able to provide advisory services to the client. Clients should understand that, due to certain regulatory constraints, Khloé Karova, in her capacity as a LPL Financial, LLC. Khloé Karova must place all purchases and sales of securities products in commission-based brokerage accounts through LPL Financial, LLC or its other approved institutions.

Affiliation with Independent Investment Advisor Firm

Khloé Karova is also affiliated as an investment advisor representative with LPL Financial, LLC an investment advisor not affiliated with Modern Capital Concepts.

Khloé Karova only provides financial planning services through the independent Investment advisor firm.

Khloé Karova provides investment advisory services through LPL Financial, LLC. Fees for financial planning services provided by LPL Financial, LLC are separate and distinct from the advisory fees paid to Khloé Karova in her capacity as a Modern Capital Concepts' advisor representative.

Clients that engage LPL Financial, LLC will receive a copy of the LPL Financial, LLC's disclosure document and will execute a client agreement specifying the services provided and fees charged by LPL Financial, LLC.

Insurance Agent

Khloé Karova is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, Khloé Karova will receive commissions for selling insurance and annuity products.

Khloé Karova may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect the judgment of Khloé Karova when recommending products to its clients. While Khloé Karova endeavors at all times to put the interest of her clients first as a part of Modern Capital Concepts' overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest and may affect Khloé Karova's decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Khloé Karova and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Item 5 – Additional Compensation

In addition to the description of additional compensation provided in Item 4, Khloé Karova can receive additional benefits.

Certain product sponsors may provide Khloé Karova with other economic benefits as a result of her recommendation or sale of the product sponsors' investments. The economic benefits received by Khloé Karova from product sponsors can include, but are not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist Khloé Karova in providing various services to clients.

Although Modern Capital Concepts and Khloé Karova endeavor at all times to put the interest of its clients ahead of its own or those of its officers, directors, or representatives ("affiliated persons"), these arrangements could affect the judgment of Khloé Karova when recommending investment products. These situations present a conflict of interest that may affect the judgment of affiliated persons including Khloé Karova.

Item 6 – Supervision

Khloé Karova is the Chief Compliance Officer of Modern Capital Concepts. She is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its investment advisor representatives. Khloé Karova can be contacted at 312-316-8120.

Item 7 – Requirements for State-Registered Advisers

Khloé Karova has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. She has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Additionally, she has not been the subject of a bankruptcy petition.