

# M3 Advisors, LLC

## ADV Part 2 A Brochure

March 31, 2022

This Brochure provides information about the qualification and business practices of M3 Advisors, LLC (“M3A “Us or “We”) and you may use the Brochure to determine whether to hire us. Please contact Anthony A. Martin at 315 Commercial Dr., Ste. A-4 Savannah, GA 31406 (912) 352-9644; or by e-mail to [tony@mfg-llc.com](mailto:tony@mfg-llc.com) to receive the M3A Form ADV Part 2A Brochure or if you have any questions about the contents of this Brochure.

M3 Advisors, LLC is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. This document has been filed with the State of Georgia and will be given to each new prospective client as required by Georgia Rules; however, the information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, The state of Georgia or by any other state securities authority.

Additional information about M3 Advisors, LLC is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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### Item 3- Material Changes

This section would include a summary of **specific material changes** made to the most recently filed ADV Part 2A Brochure. Our Brochure dated January 1, 2019 which was last filed with the state of Georgia and given to our clients was amended on March 31, 2022 and filed with the state; however, none of the changes are material in nature. In the future, this Item will reference the date of our last annual Brochure update and will discuss specific material changes, if any, that have been made to that Brochure.

Pursuant to SEC and State of Georgia Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year which is December 31st.

We will continue to provide you with disclosure information about material changes as necessary, and our most current Brochure may be requested at any time, without charge, by contacting Anthony A. Martin at 315 Commercial Dr., Ste. A-4 Savannah, GA 31406 (912) 352-9644; or by e-mail to [tony@mfg-llc.com](mailto:tony@mfg-llc.com)

## **Item 4- Advisory Business**

M3A was established in December of 2013 and filed to become a Georgia registered investment adviser in January of 2014. M3A is owned by partners Anthony A. Martin and Todd H. Martin, both of whom are investment advisor representatives of the Firm and work directly with its clients. M3A offers financial planning, consulting and investment advisory services to its clients.

### **Consulting/Financial Planning**

M3A provides consulting and financial planning services to its clients. Our process focuses on ascertaining a client's financial goals and then developing a plan to help achieve those goals. A financial plan is designed to carry a client from his/her present financial position to the attainment of specified financial goals. The nature of the plan or recommendations will depend upon a variety of variables as provided by the client. Variables include, but are not limited to, client income, net worth, risk tolerances, retirement needs, estate transfer, exit and tax planning needs.

This process may or may not include a written individual financial plan. The specific fee for any financial planning or consulting services will depend upon the nature and complexity of the plan as specifically documented in a contract to be executed with each client. As part of its financial planning and consulting services, supervised persons of M3A may provide access to securities products in their capacity as registered representatives with ValMark Securities, Inc. a registered broker dealer with Finra, the Securities and Exchange Commission (SEC) and various states; and, insurance products as insurance agents licensed and appointed with various insurance agencies and issuers including, but not limited to Martin Financial Group, LLC and Executive Insurance Agency, both insurance agencies registered in the State of Georgia.

### **Asset Management**

M3A does not manage assets on behalf of our client's. Supervised persons of M3A may provide asset management services in their capacity as registered investment advisory representatives of Valmark Advisers, Inc., an SEC registered investment advisor. Valmark Advisers, Inc. and not M3A will provide such services to our clients.

All Investment Advisory Representatives ("IAR") of M3A are also investment adviser representatives with Valmark Advisers Inc. Valmark will provide its own ADV Part 2 A disclosure document and client agreement to each client describing its services, compensation arrangements and any potential conflicts of interest. Any Third Party Money Manager will be recommended through ValMark by the IAR. The ADV Part 2A disclosure document and client agreement describing the Third Party Manager's services, compensation arrangements and any potential conflicts of interest will be provided to each client.

See item 10 below for additional information on the relationship between Valmark Securities, Inc., Valmark Advisers, Inc. and M3A .

## **Item 5- Fees and Compensation**

M3A will work with its financial planning clients on an hourly or flat rate basis. Fees will range between \$100 to \$800 per hour or \$500 to \$100,000 based on the complexity of the client's financial situation and the resources expended by M3A. All fees are negotiable at the discretion of M3A and will be specifically documented in a contract to be executed with each client. In no case will M3A charge any client fees in excess of \$500 more than 6 months in advance of completion.

Our advisory fees are exclusive of and in addition to any applicable fees including but not limited to third party manager advisory or platform fees, brokerage commissions, custodial charges, ticket fees and asset specific fees such as those charged by funds for management and administration.

Supervised persons of M3A will receive compensation for the sale of any securities products in their capacity as registered representatives with Valmark Securities, Inc.; and, insurance products as insurance agents licensed and appointed with various insurance agencies and issuers including but not limited to Martin Financial Group, LLC and Executive Insurance Agency.

M3A, through its supervised persons acting in their capacities as Investment Advisory Representatives ("IAR") of Valmark Advisers Inc., will receive a portion of asset based advisory fees paid by clients referred to other investment advisers as described above. The amount of the fee to be charged will be specifically disclosed in a written contract to be executed by Valmark and/or any Third Party Money Manager with each client. Program or asset management fees charged by the Third Party Money Manager will be disclosed in that Investment Adviser's ADV Part 2A Brochure and contract.

These affiliations cause an inherent conflict of interest as the supervised persons of M3A earn reasonable and customary fees from Valmark Advisers Inc., and commissions and/or 12b-1 fees from Valmark Securities, Inc. on these services. Any such compensation will be described to the client in detail before the product is sold. Advisory clients are under no obligation to act on any recommendations. Similar services and products may be obtained elsewhere for a lesser fee.

## **Item 6- Performance Fees**

M3A does not charge clients based upon a percentage of the capital gains or capital appreciation in their accounts.

## **Item 7 –Types of Clients**

M3A provides financial planning and investment advisory services to: individuals; corporations and other businesses; trusts; estates; and charitable foundations. We have not established a minimum value of assets for establishing a client relationship with the Firm. However, Third Party Money Managers recommended to clients may have a required minimum asset value for establishing an account. M3A will have no authority to negotiate any changes to such minimums.

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

We do not perform technical securities analysis as that task is being left to third party money managers. M3A will not assist any clients in selecting individual securities, mutual funds or other investment options in their investment portfolios or asset allocation programs.

## **Item 9- Disciplinary Information**

Registered investment advisers such as M3A are required to disclose all material facts regarding any legal, regulatory or disciplinary matters that would be considered material to your evaluation of the firm or the integrity of its management team. M3A has no information subject to disclosure under this Item.

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

All Investment Advisory Representatives of M3A are also: investment adviser representatives with Valmark Advisers Inc., an SEC registered investment adviser; registered representatives with Valmark Securities., Inc. a registered broker dealer with Finra, the Securities and Exchange Commission (SEC) and various states; and, insurance agents licensed and appointed with various insurance agencies and issuers including, but not limited to Martin Financial Group, LLC and Executive Insurance Agency, both insurance agencies registered in the State of Georgia.

These other industry affiliations cause an inherent conflict of interest as the registered persons may earn reasonable and customary fees, commissions and or 12b-1 fees on the sale of advisory, securities or insurance products. Any such compensation will be outlined in the product's prospectus (if sold by prospectus) or otherwise described to the client in detail before the product is sold. Advisory clients are not required to effect transactions through these entities and are under no obligation to act upon any recommendations.

M3A and its related persons also receive the benefits of certain products and services provided by these entities, such as fundamental research reports, technical and portfolio analyses, pricing services, economic forecasting and general marketing information, historical database information and computer software. Such benefits may be provided either directly or through third party money managers, clearing firms or other service providers.

## Item 11 - Code of Ethics

M3A has in place Ethics Rules (the "Rules") comprised of its Code of Ethics and its Insider Trading policies and procedures. The Rules are designed to ensure that personnel (i) observe applicable legal (including compliance with applicable state and federal securities laws) and ethical standards in the performance of their duties; (ii) at all times place the interests of clients and the execution of the client's transactions first; (iii) disclose all actual or potential conflicts; (iv) adhere to the highest standards of loyalty, candor and care in all matters relating to its clients; (v) conduct all personal trading consistent with the Rules, including executing all client transactions prior to personal or Firm transactions, and in such a manner as to avoid any actual or potential conflict of interest or any abuse of their position of trust and responsibility; and (vi) not use any material non-public information in securities trading.

The Rules also establish policies regarding other matters such as outside employment, the giving or receiving of gifts, and safeguarding portfolio holdings information. Under the general prohibitions of the Rules, personnel may not: 1) effect securities transactions while in possession of material nonpublic information; 2) disclose such information to others; 3) participate in fraudulent conduct involving securities held or to be acquired by any client; 4) engage in frequent trading activities that create or may create a conflict of interest, limit their ability to perform their job duties, or violate any provision of the Rules.

M3A personnel are required to conduct their personal investment activities in a manner that is not detrimental to its advisory clients. M3A personnel are not permitted to personally trade securities except under circumstances specified in the Code of Ethics. However, there may be circumstances where M3A's personnel may buy and sell on behalf of its clients, securities or other investments in which they own securities or otherwise have a personal interest. The policy requires all Access Persons (defined as all personnel employed by M3A and its related parties, officers of M3A, and other designated persons) to report all personal transactions in securities not otherwise exempt under the policy. All reportable transactions shall be reviewed for compliance with the Code of Ethics. The Rules and the Code of Ethics are available to clients and prospective clients of M3A upon request.

M3A is committed to safeguarding your confidential information and holding all personal information provided to it in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information.

M3A has a duty to disclose all potential and actual conflicts of interest. We also have a duty to report potential and actual conflicts of interest to the Company. Gifts of other than a nominal value (generally defined as under \$250) should not be accepted from persons or entities doing business with us.

## Item 12 - Brokerage Practices

### Trading Practices

M3A does not participate in the direction of any client brokerage or trading activities. All such activities, policies and procedures are carried out by the third party money manager or its designated custodian. Specific trading practices will be disclosed in the ADV 2A Brochure provided by each recommended third party money manager.

### Soft Dollar Programs

M3A does not participate in soft dollar or directed brokerage commission arrangements. However, M3A does receive the benefits of certain products and services, such as fundamental research reports, technical and portfolio analyses, pricing services, economic forecasting and general marketing information, historical database information and computer software.

### Custodian and Brokerage Fees

Clients incur certain charges imposed by their custodians and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, clients will incur charges by the executing broker-dealers in the form of brokerage commissions and transaction fees on the investment transactions entered into for their account(s). All of these charges, fees and commissions are in addition to investment advisory fees.

### Fund Disclosures

Mutual funds, closed-end funds, exchange traded funds and alternative investment funds are investment vehicles and the investment strategies, objectives and types of securities held by such funds vary widely. In addition to the advisory fee charged by M3A, clients indirectly pay for the expenses and advisory fees charged by the funds in which their assets are invested.

All such funds incur operating expenses in connection with the management of the fund. Investment funds pass some or all of these expenses through to their shareholders (the individual investors in the funds) in the form of management fees. The management fees charged vary from fund to fund. In addition, funds charge shareholders (individual investors in the funds) other types of fees such as early redemption or transaction fees. These charges also vary widely among funds. As a result, clients will still pay management fees and other, "indirect" fees and expenses as charged by each mutual fund (or other fund) in which they are invested.

Clients are provided a copy of a fund prospectus for each fund in which they invest by their custodian, by the fund sponsor or the third party money manager rather than by M3A. As required by law, a prospectus represents the fund's complete disclosure of its management and fee structure. In addition, a fund's prospectus can be obtained directly from the fund.



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

All Investment Advisory Representatives of M3A are also: investment adviser representatives with ValMark Advisers Inc., an SEC registered investment adviser. ValMark Advisers, Inc. and not M3A will provide quarterly account statements and performance reports to advisory clients. Such client accounts are reviewed at least quarterly by the assigned ValMark Advisers Inc. investment advisory representative and any significant change in market conditions may also prompt a review of client accounts. Reviews of investment accounts typically look at performance and portfolio consistency with regard to client's risk tolerance, tax situation, investment time horizon, performance objectives, and asset allocation instructions. Your assigned investment advisory representative is also a supervised person of M3A therefore Mr. Anthony A. Martin, the Firm's Chief Compliance Officer, will have oversight authority.

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

M3A receives the benefits of certain products and services, such as fundamental research reports, technical and portfolio analyses, pricing services, economic forecasting and general marketing information, historical database information and computer software either directly from third party money managers or from the custodial or other service providers. M3A does not receive any compensation or incentives other than those noted above for making client referrals to broker-dealers for brokerage services. We do not pay solicitors for bringing potential clients to us.

## **Item 15 - Custody**

M3A does not have custody of any client assets.

## **Item 16 - Investment Discretion**

M3A does not provide investment advice to, or exercise investment discretion for, any investment advisory clients. If you elect to implement recommendations through Third Party Money Managers recommended by M3A, a separate advisory agreement must be entered into governing that relationship. Any such agreement must also be accompanied by that Advisor's Form ADV Part 2A disclosure brochure.

## **Item 17 - Proxy Policy**

M3A does not have any authority to receive or vote proxies. The proxy voting policy of the investment adviser managing the client's assets will describe how proxies will be handled for the securities held in their client accounts.

## **Item 18 - Financial Information**

M3A does not collect Fees in excess of \$500 more than 6 Months in advance; does not have discretionary authority of any client accounts; does not have any financial commitment that would impair its ability to meet any contractual or fiduciary obligations to its clients; nor has the Firm been the subject of any bankruptcy proceeding.

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

All Partners and Executive Officers of M3A are listed below.

## Anthony A. Martin, Managing Partner

### Education

Bachelor of Arts, Rhodes College  
Masters of Business Administration, University of Georgia  
Master of Taxation, Tulsa University

### Examinations and Professional Designations:

Series 7 – General Securities Representative  
Series 66 – Uniform Combined State Law Exam  
CLU® – Chartered Life Underwriter®  
CFP® – Certified Financial Planner™  
AIFA® – Accredited Investment Fiduciary Analyst™

#### 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.

#### CFP® – CERTIFIED FINANCIAL PLANNER™

The CFP® designation is offered and recognized by the Certified Financial Planning Board of Standards, Inc. Candidates must have a bachelor's degree (or higher) from an accredited college or university and at least 3 years of full-time personal financial planning experience. Certificants must complete a CFP®-board registered program or hold one of the following designations; CPA, ChFC®, CLU®, CFA®, Ph.D. in business or economics, Doctor of Business Administration, or an Attorney's License. Certificants must also successfully pass a 2-day comprehensive examination and complete 30 hours of continuing education credits every 2 years.

#### AIFA® – Accredited Investment Fiduciary Analyst™

The AIFA® designation is offered and recognized by the Center for Fiduciary Studies. To earn the AIFA®, candidates must a) be an AIF® program graduate and meet the requirement from the AIFA® matrix, b) complete a 3 day classroom program, and c) pass a final certification exam. Those who obtain the AIFA® must complete 10 hours of continuing education annually.

### Business Experience:

Partner and Investment Advisor Representative, M3 Advisors, LLC, 2013 – Present  
Partner, Martin Financial Group, LLC, 2008 – Present  
Registered Representative, ValMark Securities, Inc., 2008 – Present  
Investment Advisor Representative, ValMark Advisers, Inc., 2008 – Present  
Registered Representative, Pruco Securities, LLC, 2000 - 2008

### Other Business Activities

Anthony A. Martin is an Investment Advisor Representative of ValMark Advisers, Inc., an SEC registered investment advisory firm and **will receive** compensation for advisory services effected through ValMark Advisers. Anthony A. Martin is a Registered Representative of ValMark Securities, Inc., a broker dealer under common ownership and management of ValMark Advisers, Inc. and **will receive** normal commissions associated with securities sales. Anthony A. Martin is also an insurance agent affiliated with Executive Insurance Agency, Inc., an agency under common ownership and management of ValMark Advisers, Inc. Anthony A. Martin **will receive** insurance

commissions surrounding the sales of insurance products sold through the affiliated insurance agency, Executive Insurance Agency, Inc.  
Mr. Martin spends approximately 75% of his time on these other business activities.

### **Requirements for State Registered Advisers**

State registered investment advisers are required to disclose the material facts regarding the involvement in certain civil, self-regulatory organization or administrative proceedings, arbitration awards or findings, or bankruptcy proceedings. Mr. Martin has no such information to disclose in relation to this Item.

## **Todd H. Martin, Partner**

### **Education**

University of Georgia  
B.A., Risk Management and Insurance

### **Examinations and Professional Designations:**

Series 6 – Investment Company Products/Variable Contracts Limited Representative  
Series 63 – Uniform Securities Agent State Law Exam  
CLU<sup>®</sup> – Chartered Life Underwriter<sup>®</sup>  
ChFC<sup>®</sup> – Chartered Financial Consultant<sup>®</sup>  
AEP<sup>®</sup> – Accredited Estate Planner<sup>®</sup>

#### **CLU<sup>®</sup> – Chartered Life Underwriter<sup>®</sup>**

The CLU<sup>®</sup> 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<sup>®</sup> – Chartered Financial Consultant<sup>®</sup>**

The ChFC<sup>®</sup> 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.

#### **AEP<sup>®</sup> – Accredited Estate Planner<sup>®</sup>**

The AEP<sup>®</sup> designation is offered and recognized by the National Association of Estate Planners & Councils. To earn the AEP<sup>®</sup>, candidates must meet all of the following requirements: a) be an attorney (JD), accountant (CPA), insurance professional and financial planner (CLU<sup>®</sup>/ChFC<sup>®</sup>, CFP<sup>®</sup>), or trust officer, b) be in good standing with their professional organization and not be subject to disciplinary investigation, c) have a minimum of 5 years' experience in estate planning in one or more of the prerequisite professions, d) have completed 2 graduate level courses administered by The American College or by another accredited graduate program as part of a master's or doctoral degree unless applicant has 15 or more years' experience as an estate planner, and d) pass a final examination for each course. Those who obtain the AEP<sup>®</sup> must complete 30 hours of continuing education every 2 years, including 15 hours in estate planning. Re-certification is required annually.

### **Other Business Activities**

Todd Martin is an Investment Advisor Representative of ValMark Advisers, Inc., an SEC registered investment advisory firm and **will receive** compensation for advisory services effected through ValMark Advisers. Todd Martin is a Registered Representative of ValMark Securities, Inc., a broker dealer under common ownership and management of ValMark Advisers, Inc. and **will receive** normal commissions associated with securities sales. Todd Martin is also an insurance agent affiliated with Executive Insurance Agency, Inc., an agency under common ownership and management of ValMark Advisers, Inc. Todd Martin **will receive** insurance commissions surrounding the sales of insurance products sold through the affiliated insurance agency, Executive Insurance Agency, Inc. Todd Martin spends approximately 75% of his time on these other business activities.

### **Requirements for State Registered Advisers**

State registered investment advisers are required to disclose the material facts regarding the involvement in certain civil, self-regulatory organization or administrative proceedings, arbitration awards or findings, or bankruptcy proceedings. Todd Martin has no such information to disclose in relation to this Item.