

*JOTKOFF FINANCIAL
SERVICES INC.*

**Form ADV Part 2A Brochure
May 7, 2018**

ALAN M. JOTKOFF

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This Brochure provides information about the qualifications and business practices of Jotkoff Financial Services, Inc. (“ADVISER”) (CRD #107670). If you have any questions about the contents of this Brochure, please contact us at 321-984-7345 and/or Ajotkoff@jotkoff.com. Currently, our Brochure may be requested free of charge by contacting Alan M. Jotkoff, President at 321-984-7345 or Ajotkoff@jotkoff.com. Our Brochure is also available on our web site www.jotkoff.com, also free of charge.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Jotkoff Financial Services, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Jotkoff Financial Services, Inc. also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

There are no material changes to our Brochure since our last annual update dated March 2018. However, clarifications were made to Item 15 regarding custody.

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Item 4 – Advisory Business

JOTKOFF FINANCIAL SERVICES, INC., hereinafter referred to as "**JFS**", a registered investment advisor, provides investment counseling and financial planning to individuals, qualified pension/profit sharing plans, fiduciaries, corporations and small businesses who desire a high degree of personalized service. **JFS** specializes in portfolio construction, asset management, selection and monitoring of the investment performance of third-party portfolio management services offered by other investment advisors. These services are described in greater detail as follows:

INVESTMENT SERVICES -

JFS provides investment management services on a non-discretionary basis to respective clients in designing a tailored investment portfolio. Such services will begin with the preparation of a financial profile. This financial profile will highlight the client's assets/liabilities, performance targets, liquidity needs, investment objectives, risk tolerances, and other variables which will assist in gauging the client's investment characteristics and available resources so that **JFS** can achieve optimal performance on client's investments.

PRIVATE PORTFOLIO MANAGEMENT -

Clients can also engage **JFS** in the due diligence, selection and monitoring of the investment performance of third-party portfolio management services offered by other investment advisors ("Portfolio Managers") for the provision of investment management, allocation and timing services. Such Portfolio Managers in turn, will also provide direct management of client assets through the creation of portfolios designed to meet stated goals and objectives. The Portfolio Managers may have little or no direct client contact, relying instead on prequalification by **JFS** through the client financial profile. **JFS** will perform such qualifying analysis together with performing certain professional, administrative and clerical duties prior to selection and opening accounts with a particular Portfolio Manager. Once an account has been established, **JFS** will continue to monitor the Portfolio Manager and provide the client with periodic updates of their performance.

COMPREHENSIVE & SEGMENTED FINANCIAL PLANNING -

JFS provides two types of financial planning services to clients - Comprehensive Financial Planning and Segmented Financial Planning.

Comprehensive Financial Planning is the development of a comprehensive set of solutions for individual and business financial problems. Segmented Financial Planning is the specialized

analysis and evaluation of one or more items identified under the Comprehensive Financial Plan.

In general, financial planning addresses the following areas of concern:

- Personal: Family records, budgeting, children's education, insurance needs, personal liability, estate information and financial goals.
- Taxes & Cash Flow: Income tax and spending analysis and planning for past, current and future years. **JFS** will illustrate the impact of various investments on clients' current income tax and future tax liability.
- Death & Disability: Cash needs at death, income needs of surviving dependents, estate planning and income analysis.
- Retirement: Analysis of current strategies and investment plans to help clients achieve their retirement goals.
- Investments: Analysis of investment alternatives and their effect on client's portfolio(s).

JFS is 100% owned by Alan M. Jotkoff and has been providing advisory services since March 1998.

As of December 31, 2017, **JFS** managed \$28,631,129 on a non-discretionary basis. **JFS** provides investment supervisory services and manages investment advisory accounts not involving supervisory services depending on the needs of our clients

Item 5 – Fees and Compensation

All fees are subject to negotiation between **JFS** and our client.

The specific manner in which fees are charged by **JFS** is established in a client's written agreement with **JFS**. **JFS'** fees are determined by a percentage of assets under management; hourly charges or fixed fees.

JFS will generally bill its fees on a quarterly basis. Clients may elect to be billed directly for fees or to authorize **JFS** to directly debit fees from client accounts. Management fees may be adjusted for capital contributions and withdrawals made during the applicable calendar quarter if they result in significant increases or decreases in the assets under management in the account. Accounts initiated or terminated during a calendar quarter will be charged a prorated

fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. **JFS** will deliver the Form ADV Part 2 to the client before or at the time **JFS** enters into an investment advisory agreement with the client. If the appropriate disclosure brochure was not delivered to the client at least forty-eight (48) hours prior to entering into any written or oral advisory agreement with **JFS**, then the client will have the right to terminate the agreement without penalty within five (5) business days after entering into the agreement.

JFS' fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, 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. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to **JFS'** fee, and **JFS** shall not receive any portion of these commissions, fees, and costs.

JFS retains discretion to modify the above fee structure depending on the size, complexity, specific products, and nature of the portfolio managed. If client has more than one portfolio under advisement, **JFS** may elect at its sole discretion to aggregate the client portfolios for the purposes of computing management fees.

The value of the Account assets (securities, cash, and cash equivalents) under management shall be determined as of the last day of each calendar quarter, the "Valuation Date," by an independent pricing service, where available, or otherwise in good faith. **JFS'** fees shall be based on the Account value on the Valuation Date.

The fee schedule applicable as of this Brochure is as follows:

| Client Assets | Annual Fee (%) for all assets |
|---|--------------------------------------|
| On the first \$250,000 | 2.5% |
| On the next \$250,000 | 2.0% |
| On the next \$500,000 | 1.5% |
| On all amounts in excess of \$1,000,000 | 1.0% |

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

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

Item 7 – Types of Clients

JFS provides portfolio management services to individuals, qualified pension/profit sharing plans, fiduciaries, corporations and small businesses.

JFS requires a minimum initial investment of \$25,000 to open an Investment Services Account. This requirement may be waived at the sole discretion of the firm. Factors such as the client's proposed investment size and/or a long-term commitment may be taken into consideration in negotiating the minimum initial investment.

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

JFS utilizes a fundamental method analysis. Our main sources of information are financial newspapers, magazines and websites; research materials prepared by others; corporate rating services; annual reports, prospectuses, filings with the SEC and company press releases.

The investment strategies used to implement any investment advice given to clients includes: long term purchases, short term purchases, trading, short sales, margin transactions and option writing.

Investing in securities involves risk of loss that clients should be prepared to bear. **JFS** does not guarantee the future performance of the account or any specific level of performance, the success of any investment decision or strategy that **JFS** may use, or the success of adviser's overall management of the account. Client understands that investment risks, and that those investment decisions are subject to various market, currency, economic, political and business risks, and that those investment decisions will not always be profitable.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of **JFS** or the integrity of **JFS'** management.

On June 25, 2012, **JFS** entered into a Stipulation and Consent Agreement with State of Florida, Office of Financial Regulation ("Office") for failure to file financial statements with the Office within 90 days of December 31, 2009; 2010; and 2011 which are violations of Section 517.121 of the Florida Statutes, and Rule 69W-600.015 of the Florida Administrative Code. A Final Order was entered into on June 28, 2012.

Item 10 – Other Financial Industry Activities and Affiliations

Alan Jotkoff is the President of Jotkoff & Associates P.A., a CPA firm. He is actively engaged in an accounting practice with business interests separate and distinct from the operations of **JFS**, including certain consulting activities beyond the scope of services provided by **JFS**. His time devoted to these other activities is approximately 70% depending on his responsibilities or position within Jotkoff & Associates P.A. and/or the independent needs of the firm's tax/accounting clients.

Alan Jotkoff is a registered representative with Triad Advisors. Triad Advisors is a Broker/Dealer located in Atlanta, GA and he devotes 4% of his time. He is licensed to sell various insurance and variable annuity products to clients and he devotes 1% of his time.

Other than what is discussed above, neither **JFS**, nor any of our management persons (except as disclosed below), are registered, or have an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor or as an associated person of the foregoing entities.

In addition, neither **JFS**, nor any of our management persons, have any relationship or arrangement that is material to our advisory business or to our clients that we or any of our management persons have with any related person that is, under common control and ownership, a:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker,
- Other investment adviser or financial planner,

- Futures commission merchant (or commodity pool operator or commodity trading advisor),
- banking or thrift institution,
- Insurance company or agency,
- Pension consultant,
- Real estate broker or dealer or
- Sponsor or syndicator of limited partnerships.

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

JFS has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at **JFS** must acknowledge the terms of the Code of Ethics annually, or as amended.

JFS anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which **JFS** has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which **JFS**, its affiliates and/or clients, directly or indirectly, have a position of interest. **JFS'** employees and persons associated with **JFS** are required to follow **JFS'** Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of **JFS** and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for **JFS'** clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of **JFS** will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of **JFS'** clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a

possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between **JFS** and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with **JFS'** obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. **JFS** will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

JFS' clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Alan Jotkoff.

It is **JFS'** policy that the firm will not affect any principal or agency cross securities transactions for client accounts. **JFS** will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

JFS has entered into an agreement with TD Ameritrade Institutional, a division of TD Ameritrade, Inc., member FINRA/SIPC ("TD Ameritrade") wherein TD Ameritrade will perform brokerage and custodial functions for all client accounts of **JFS**. These custodial functions include executing transactions in client accounts, issuing confirmations for those transactions, and issuing monthly or quarterly account statements. Unless specifically directed by the client, all investment advisory accounts of **JFS** will be maintained through TD Ameritrade. **JFS** reserves the right, however, to refuse to provide advisory services relative to accounts maintained at broker-dealers or custodians other than TD Ameritrade. **JFS** selected TD Ameritrade to provide brokerage and custodial services for its advisory clients as a result of the review of a number of

entities that provide similar services. While **JFS** believes that the services offered by TD Ameritrade best meet its needs and the needs of its clients, **JFS** does not warrant or represent that the charges assessed by TD Ameritrade for those services are less expensive than other providers of the same services.

As a member of FINRA, Triad Advisors is obligated to perform certain supervisory functions with respect to the activities of its registered representatives. Those supervisory responsibilities extend to the review of the investment advisory activities of representatives who, like the representatives of **JFS**, are engaged in advisory activities separate and apart from Triad Advisors. In consideration for those supervisory functions, **JFS** and its advisory representatives may pay Triad Advisors a portion of the advisory fees they receive.

Soft dollar benefits are not proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

Item 13 – Review of Accounts

JFS provides investment management services on a non-discretionary basis for respective clients in designing a tailored investment portfolio. Such services will begin with the preparation of a financial profile. This financial profile will highlight the client's assets/liabilities, performance targets, liquidity needs, investment objectives, risk tolerances, and other variables which will assist in gauging the client's investment characteristics and available resources so that **JFS** can achieve optimal performance on client's investments.

Alan Jotkoff, President is responsible for the review of transactions in all client accounts, the review of client account activity, and the analysis of portfolio performance. Mr. Jotkoff reviews transactions as they are affected in client accounts to ensure that those transactions are consistent with each client's individual investment objectives and risk tolerance. On a quarterly basis, Mr. Jotkoff reviews client activity in client accounts and portfolio performance to ensure that the overall activity in each account is consistent with the client's objectives.

JFS provides comprehensive portfolio performance reports to clients quarterly. Such reports will be sent to clients not later than thirty (30) days after the end of the calendar quarters ending March, June, September and December.

Item 14 – Client Referrals and Other Compensation

Alan Jotkoff is also a registered representative with Triad Advisors, a member FINRA, SIPC. Through this affiliation, he is licensed to sell various insurance and variable annuity products to clients as part of a full range of financial services offered by **JFS**.

JFS does not compensate any person for client referrals.

Item 15 – Custody

JFS does not take physical possession of client funds or securities. Client assets are held at a qualified custodian. However, given that **JFS** may be granted authority to deduct the advisory fees from the client's account, **JFS** is deemed to have custody under the State of Florida regulations. **JFS** will comply with the safekeeping requirements imposed by the State of Florida in that **JFS** will obtain prior written authorization from you to deduct advisory fees from the client's account held by a qualified custodian. **JFS** will send a copy of the client's invoice with the amount of the fee to be deducted from the client's account to the qualified custodian at the same time that **JFS** send a copy to you. The invoice will specify the fee including the formula used to calculate the fee, the amount of assets under management the fee was based on, and time period covered by the fee. The qualified custodian will send to you, at least quarterly, your account statements identifying the amount of funds and securities held with the qualified custodian that occurred in your account at the end of period and setting forth all transactions in the account during that period including the amount of advisory fees paid directly to **JFS**.

In addition, **JFS** is also deemed to have custody of clients' funds or securities when clients have standing letters of authorizations ("SLOAs") with their custodian to move money from a client's account to a third-party, and under that SLOA it authorizes **JFS** to designate the amount or timing of transfers with the custodian. The SEC has set forth a set of standards intended to protect client assets in such situations, which **JFS** follow.

Clients should receive at least quarterly statements from the broker dealer, TD Ameritrade or other qualified custodian that holds and maintains client's investment assets. **JFS** urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. You should contact **JFS** at the address or phone number on the cover of this

brochure with any questions about your statements. You should notify **JFS** if you do not receive the account statements, at least quarterly, from the qualified custodian.

Item 16 – Investment Discretion

JFS does not have discretionary authority to manage the securities accounts on client's behalf. Therefore, **JFS** does not have the discretionary authority to determine which securities to buy or sell or the amount of securities to be bought or sold. Furthermore, **JFS** does not have the discretionary authority to determine the broker or dealer in which to execute such securities transactions, and determine what transaction fee rate shall be paid on the client's behalf.

JFS observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to **JFS** in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, **JFS** does not have any authority to and does not vote proxies on behalf of advisory clients. While Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios, from time to time clients have elected to give **JFS** authority to complete proxy voting. However, as a rule, we do not automatically have the authority (nor do we encourage it). **JFS** may provide advice to clients regarding the clients' voting of proxies.

Clients may obtain a copy of **JFS'** complete proxy voting policies and procedures upon request. Clients may also obtain information from **JFS** about how **JFS** voted any proxies on behalf of their account(s).

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about **JFS'** financial condition. **JFS** has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

Each of our principal executive officers and management persons will provide the Form ADV Part 2B (“Brochure Supplement”) which describes their formal education and business background including any business in which they are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business.

JFS does not, nor do any of our supervised persons receive performance-based fees compensation for advisory services.

JFS does not, nor do any of our management persons, have any legal, financial or other “disciplinary” items to report.

JFS does not, nor do any of our management persons, have any relationship or arrangement with any issuer of securities that is not listed in Item 10 of this Brochure. See Item 10 for more details.

Jotkoff Financial Services, Inc.

Form ADV Part 2B Brochure Supplement

March 28, 2018

Alan M. Jotkoff, CPA/PFS®, CFP®,
CLU®, CGMA®

Jotkoff Financial Services, Inc.
2100 Meadowlane Avenue
W Melbourne, FL 32904
321-984-7345

This Brochure Supplement provides information about Alan M. Jotkoff that supplements the Jotkoff Financial Services, Inc. (“JFS”) Brochure (“Brochure”). You should have received a copy of that Brochure. Please contact Alan M. Jotkoff at (321) 984-7345 or via email at Ajotkoff@jotkoff.com if you did not receive JFS’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Alan M. Jotkoff is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Alan Michael Jotkoff, CPA/PFS®, CFP®, CLU®, CGMA®

CRD #: 1601180

DOB: 1954

Educational Background:

University of South Florida, BA Accounting

University of Miami, MS Accounting

Business Background:

10/1982 - Present President, Jotkoff Financial Services, Inc.

10/2006 - Present Registered Representative, Triad Advisors, LLC

01/2002 - 12/2005 Controller, NPE Systems, Inc.

02/1998 - 09/2006 Registered Principal, FSC Securities Corporation

06/1996 - 02/1997 Controller, CFO, Herling Applied Technologies, Inc

06/1995 - 02/1998 Registered Principal, 1st Global Capital Corp.

02/1995 - 12/1995 CFO, RSTV, Inc.

08/1994 - 11/1995 President, Aventura Beach Club, Inc.

08/1987 - 12/1995 Accountant, Crescent Group of Companies Inc.

11/1986 - 06/1995 Registered Representative, H.D. Vest Investment Securities, Inc.

10/1982 - 09/2009 President, Jotkoff Financial Group, Inc.

06/1980 - 12/1995 Accountant, Galbut Family of Companies Inc.

10/1982 - Present President, Jotkoff & Associates P.A.

Certified Public Accountant (1979)

PROFESSIONAL DESIGNATION DISCLOSURES:

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year

period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy has adopted the AICPA's Code of Professional Conduct within their state accountancy laws or has created their own.

Personal Financial Specialist (1980)

PROFESSIONAL DESIGNATION DISCLOSURES:

A specialty credential awarded by the American Institute of Certified Public Accountants (AICPA) to CPAs who specialize in helping individuals plan all aspects of their wealth. The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct, and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning Practice. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years.

Certified Financial Planner™, CFP®, and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") (1988)

PROFESSIONAL DESIGNATION DISCLOSURES:

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.

Chartered Life Underwriter (CLU®) (2006)

PROFESSIONAL DESIGNATION DISCLOSURES:

The Chartered Life Underwriter® (CLU®) is the world's most respected designation of insurance expertise; helping recipients gain a significant advantage in a competitive market. This prestigious course of study helps charter holders by providing in-depth knowledge on the insurance needs of individuals, business owners and professional clients.

To receive the CLU® designation, one must successfully complete all courses in his/her selected program, meet the three years of full-time business experience requirement and ethics standards, and agree to comply with The American College Code of Ethics and Procedures.

CLU® is an eight-course (5 required plus 3 elective courses), college-level program. Each course involves an average of 50 hours of study. The curriculum includes:

Required Courses:

- Individual Life Insurance
- Fundamentals of Insurance Planning
- Life Insurance Law
- Planning for Business Owners and Professionals
- Fundamentals of Estate Planning

Elective Courses:

- Financial Planning: Process and Environment
- Group Benefits
- Planning for Retirement Needs
- Estate Planning Applications
- Investments
- Income Taxation

Continuing Education:

All CLU®s who matriculated after June 30, 1989 are subject to the PACE Recertification Program. If one is a ChFC® who falls into any of the following specified categories, he/she is required to earn 30 hours of CE credit every two years:

- Licensed insurance agent/broker/consultant
- Licensed security representative/registered investment advisor
- Financial consultant, attorney, accountant, employee benefits specialist, and any other individual who provides insurance, employee benefits, financial planning, or estate planning advice and counsel to the public

If one is a CLU® subject to PACE but do not fall into one of the above categories, he/she is exempt from the CE requirements. He/she will be required to notify The College of their exempt status every reporting period, as long as the exemption applies.

Chartered Global Management Accountant (CGMA®) (2012)

PROFESSIONAL DESIGNATION DISCLOSURES:

Chartered Global Management Accountant (CGMA) is a professional management accounting designation. CGMA, a proprietary designation for management accountants, is powered by two of the world's most respected accounting bodies, and advances the global discipline of management accounting. The CGMA demonstrates management accounting expertise, determination and commitment to achieving sustainable business success.

The issuing body is a joint venture owned by the American Institute of Certified Public Accountants (AICPA) and the Chartered Institute of Management Accountants (CIMA). The CIMA Pathway requires CIMA members to pass the required CIMA examinations including the CIMA certificate in Business Accounting, have 3 years management accounting experience and be a member of the CIMA.

To qualify for the CGMA designation through the AICPA, he/she must be a member of the AICPA, pass the CGMA exam and have a minimum of three years relevant, work-based, practical management accounting experience.

Eligible AICPA members must attest they meet the experience requirements when applying to obtain the CGMA designation:

- Minimum 36 months of relevant management accounting experience, as defined by the CGMA Competency Framework.

- Range of experience across at least four (4) competencies in the Technical and Business Skills knowledge areas, with a minimum of one (1) per area.
- Depth of experience with a minimum of 18 months at the Intermediate (or higher) proficiency level as defined in the CGMA Competency Framework.
- Demonstrated work-based experience in competencies from the Leadership or People Skills knowledge areas.

For detailed descriptions of qualifying competencies, please refer to the complete CGMA Competency Framework.

Maintaining the CGMA Designation

To maintain the CGMA designation, he/she must remain a member of the AICPA in good standing and pay the annual fee for the designation. Continuing professional education (CPE) is required for CPAs to maintain their professional competence and provide quality professional services. He/she are responsible for complying with all applicable CPE requirements, rules and regulations of state boards of accountancy, as well as those of the AICPA. There are no additional requirements for CGMA designation holders.

Alan M. Jotkoff currently holds the Series 6 (Investment Company Products/Variable Contracts Representative), Series 7 (General Securities Representative), Series 22 (Direct Participation Programs Representative), Series 24 (General Securities Principal), Series 63 (Uniform Securities Agent State Law Exam) and Series 65 (NASAA-Uniform Investment Advisors Law Exam) licenses.

Item 3- Disciplinary Information

Jotkoff Financial Services, Inc. is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Alan M. Jotkoff. No events have occurred that are applicable to this Item.

Item 4- Other Business Activities

Alan M. Jotkoff is the President of Jotkoff & Associates P.A., a CPA firm. He is actively engaged in an accounting practice with business interests separate and distinct from the operations of **JFS**, including certain consulting activities beyond the scope of services provided by **JFS**. His time devoted to these other activities is approximately 70% depending on his responsibilities or position within Jotkoff & Associates P.A. and/or the independent needs of the firm's tax/accounting clients.

Alan Jotkoff is a registered representative with Triad Advisors. Triad Advisors is a Broker/Dealer located in Atlanta, GA and he devotes 4% of his time.

Other than what is discussed above, Alan M. Jotkoff is not actively engaged in any other investment-related business or occupation, nor does he have an application pending to register as a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or as an associated person of an FCM, CPO, or CTA.

Additionally, Alan M. Jotkoff is not actively engaged in any other business or occupation for compensation, nor is he actively engaged in any other business activity or activities that provides a substantial source of income or involves a substantial amount of his time.

Item 5- Additional Compensation

Alan M. Jotkoff is also a registered representative with Triad Advisors, a member FINRA, SIPC. Through this affiliation, he is licensed to sell various insurance and variable annuity products to clients as part of a full range of financial services offered by **JFS**.

Item 6 - Supervision

As a member of FINRA, Triad Advisors is obligated to perform certain supervisory functions with respect to the activities of its registered representatives. Those supervisory responsibilities extend to the review of the investment advisory activities of representatives who, like the representatives of **JFS**, are engaged in advisory activities separate and apart from Triad Advisors. In consideration for those supervisory functions, **JFS** and its advisory representatives may pay Triad Advisors a portion of the advisory fees they receive.

Item 7- Requirements for State-Registered Advisers

Alan M. Jotkoff has not been involved in any arbitration claims or any civil, self-regulatory organization or administrative proceeding involving investment advisory business or activities. In addition, Alan M. Jotkoff is not currently, nor at any time been the subject of a bankruptcy petition.

Jotkoff Financial Services, Inc.

**Form ADV Part 2B Brochure Supplement
March 28, 2018**

Kim M. James, CPA/PFS®, CFP®,
CLU®

Jotkoff Financial Services, Inc.
2100 Meadowlane Avenue
W Melbourne, FL 32904
321-984-7345

This Brochure Supplement provides information about Kim M. James that supplements the Jotkoff Financial Services, Inc. (“JFS”) Brochure (“Brochure”). You should have received a copy of that Brochure. Please contact Alan M. Jotkoff at (321) 984-7345 or via email at Ajotkoff@jotkoff.com if you did not receive JFS’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Kim M. James is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Kim Marie James, CPA/PFS®, CFP®, CLU®

CRD #: 2919666

DOB: 1965

Educational Background:

University of Maryland, AA (1984)

Columbia College, BS Business Administration (1992)

Nova Southeastern University, MS Accounting (2003)

University of the Cumberlands, Ed.D (2015)

Business Background:

12/1999 - Present Investment Manager, Jotkoff Financial Services, Inc.

03/2012 - Present Registered Administrative Representative, Triad Advisors, LLC

01/2012 - Present Adjunct Faculty - Leadership, Austin Peay State University

12/1999 - Present CPA/CFP, Jotkoff & Associates, P.A.

08/2016 - 12/2017 Resource Professor, Jacksonville University

08/2014 - 08/2016 Assistant Professor, Alderson Broaddus University

08/2013 - 06/2014 Professor, Jinhua Polytech

08/2012 - 07/2016 Adjunct Instructor, Marylhurst University

01/2009 - 12/2013 Professor, Kaplan University

08/1997 - 10/2006 Registered Representative, FSC Securities Corporation

PROFESSIONAL DESIGNATIONS:

Certified Public Accountant (2003)

PROFESSIONAL DESIGNATION DISCLOSURES:

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy has adopted the AICPA's Code of Professional Conduct within their state accountancy laws or has created their own.

Personal Financial Specialist (2010)

PROFESSIONAL DESIGNATION DISCLOSURES:

A specialty credential awarded by the American Institute of Certified Public Accountants (AICPA) to CPAs who specialize in helping individuals plan all aspects of their wealth. The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct, and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning Practice. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years.

Certified Financial Planner™, CFP®, and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") (1998)

PROFESSIONAL DESIGNATION DISCLOSURES:

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.

Chartered Life Underwriter (CLU®) (2006)

PROFESSIONAL DESIGNATION DISCLOSURES:

The Chartered Life Underwriter® (CLU®) is the world's most respected designation of insurance expertise; helping recipients gain a significant advantage in a competitive market. This prestigious course of study helps charter holders by providing in-depth knowledge on the insurance needs of individuals, business owners and professional clients.

To receive the CLU® designation, one must successfully complete all courses in his/her selected program, meet the three years of full-time business experience requirement and ethics standards, and agree to comply with The American College Code of Ethics and Procedures.

CLU® is an eight-course (5 required plus 3 elective courses), college-level program. Each course involves an average of 50 hours of study. The curriculum includes:

Required Courses:

- Individual Life Insurance
- Fundamentals of Insurance Planning
- Life Insurance Law
- Planning for Business Owners and Professionals
- Fundamentals of Estate Planning

Elective Courses:

- Financial Planning: Process and Environment
- Group Benefits
- Planning for Retirement Needs
- Estate Planning Applications
- Investments
- Income Taxation

Continuing Education:

All CLU®s who matriculated after June 30, 1989 are subject to the PACE Recertification Program. If one is a ChFC® who falls into any of the following specified categories, he/she is required to earn 30 hours of CE credit every two years:

- Licensed insurance agent/broker/consultant
- Licensed security representative/registered investment advisor
- Financial consultant, attorney, accountant, employee benefits specialist, and any other individual who provides insurance, employee benefits, financial planning, or estate planning advice and counsel to the public

If one is a CLU® subject to PACE but do not fall into one of the above categories, he/she is exempt from the CE requirements. He/she will be required to notify The College of your exempt status every reporting period, as long as the exemption applies.

Kim M. James currently holds the Series 7 (General Securities Representative), Series 24 (General Securities Principal), Series 63 (Uniform Securities Agent State Law Exam) and Series 65 (NASAA-Uniform Investment Advisors Law Exam) licenses.

Item 3- Disciplinary Information

Jotkoff Financial Services, Inc. is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Kim M. James. No events have occurred that are applicable to this Item.

Item 4- Other Business Activities

Kim M. James is a Certified Public Accountant of Jotkoff & Associates, P.A., a CPA firm. She is actively engaged in an accounting practice with business interests separate and distinct from the operations of **JFS**, including certain consulting activities beyond the scope of services provided by **JFS**. Her time devoted to these other activities are 25%. She is also a professor at Jacksonville University. She spends 50% of her time teaching.

Kim M. James is a registered administrative representative with Triad Advisors. Triad Advisors is a Broker/Dealer located in Atlanta, GA and she devotes 15% of her time.

Other than what is discussed above, Kim M. James is not actively engaged in any other investment-related business or occupation, nor does she have an application pending to register as a broker-dealer, futures commission merchant ("FCM"), commodity pool operator

("CPO"), commodity trading advisor ("CTA"), or as an associated person of an FCM, CPO, or CTA.

Additionally, Kim M. James is not actively engaged in any other business or occupation for compensation, nor is she actively engaged in any other business activity or activities that provides a substantial source of income or involves a substantial amount of her time.

Item 5- Additional Compensation

Kim M. James is also a registered administrative representative with Triad Advisors, a member FINRA, SIPC. Through this affiliation, she is licensed to sell various insurance and variable annuity products to clients as part of a full range of financial services offered by **JFS**.

Item 6 - Supervision

As a member of FINRA, Triad Advisors is obligated to perform certain supervisory functions with respect to the activities of its registered representatives. Those supervisory responsibilities extend to the review of the investment advisory activities of representatives who, like the representatives of **JFS**, are engaged in advisory activities separate and apart from Triad Advisors. In consideration for those supervisory functions, **JFS** and its advisory representatives may pay Triad Advisors a portion of the advisory fees they receive.

Item 7- Requirements for State-Registered Advisers

Kim M. James has not been involved in any arbitration claims or any civil, self-regulatory organization or administrative proceeding involving investment advisory business or activities. In addition, Kim M. James is not currently, nor at any time been the subject of a bankruptcy petition.

Jotkoff Financial Services, Inc.

Form ADV Part 2B Brochure Supplement

March 28, 2018

Ryan P. Jotkoff, CFP®, CLU®

Jotkoff Financial Services, Inc.

2100 Meadowlane Avenue

W Melbourne, FL 32904

321-984-7345

This Brochure Supplement provides information about Ryan P. Jotkoff that supplements the Jotkoff Financial Services, Inc. (“JFS”) Brochure (“Brochure”). You should have received a copy of that Brochure. Please contact Alan M. Jotkoff at (321) 984-7345 or via email at AJotkoff@jotkoff.com if you did not receive JFS’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Ryan P. Jotkoff is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Ryan Philip Jotkoff, CFP®, CLU®

CRD #: 4235923

DOB: 1981

Educational Background:

Florida State University, Bachelor of Science in Accounting (2003)

Kennesaw State University, Masters of Business Administration (2010)

Business Background:

06/2000 - Present Clerk, Jotkoff Financial Services, Inc.

03/2013 - Present Conversion Manager, Hanlon Investment Management, Inc.

05/2012 - 03/2013 Business Analysts, Cooper Capital Group, LLC

07/2009 - 05/2012 Conversion Manager, Interactive Advisory Software, LLC

10/2006 - Present Registered Administrative Representative, Triad Advisors, LLC

08/2003 - 05/2006 Closing Coordinator, Crescent Heights

08/2001 - 10/2006 Registered Representative, FSC Securities Corporation

06/1999 - 08/2003 Student, Florida State University

PROFESSIONAL DESIGNATIONS:

Certified Financial Planner™, CFP®, and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) (2017)

PROFESSIONAL DESIGNATION DISCLOSURES:

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 the 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). The 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 the 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 the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Chartered Life Underwriter® (CLU®) (2018)

PROFESSIONAL DESIGNATION DISCLOSURES:

The Chartered Life Underwriter® (CLU®) provides in-depth knowledge on the insurance needs of individuals, business owners and professional clients, and gain a significant advantage in a competitive market.

To receive the CLU® designation, one must successfully complete all courses in his/her selected program, meet the three years of full-time business experience requirements and ethics standards, and agree to comply with The American College Code of Ethics and Procedures.

CLU® is an eight-course (5 required plus 3 elective courses), college-level program. Each course involves an average of 50 hours of study. The curriculum includes:

Required courses:

- Fundamentals of Insurance Planning
- Individual Life Insurance
- Life Insurance Law
- Fundamentals of Estate Planning
- Planning for Business Owners and Professionals

Elective courses:

- Financial Planning: Process and Environment
- Individual Health Insurance
- Income Taxation
- Group Benefits
- Planning for Retirement Needs
- Investments
- Estate Planning Applications

Continuing Education:

All CLU®s who matriculated after June 30, 1989 are subject to the PACE Recertification Program. One who falls into any of the following specified categories is required to earn 30 hours of CE credit every two years:

- Licensed insurance agent/broker/consultant
- Licensed security representative/registered investment advisor
- Financial consultant, attorney, accountant, employee benefits specialist, and any other individual who provides insurance, employee benefits, financial planning, or estate planning advice and counsel to the public

One, who is subject to PACE but do not fall into one of the above categories, is exempt from the CE requirements. He/she is required to notify The College of his/her exempt status every reporting period, as long as the exemption applies.

Ryan P. Jotkoff currently holds the Series 7 (General Securities Representative) and Series 66 (NASAA-Uniform Combined State Law Exam) licenses.

Item 3- Disciplinary Information

Jotkoff Financial Services, Inc. is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Ryan P. Jotkoff. No events have occurred that are applicable to this Item.

Item 4- Other Business Activities

Ryan P. Jotkoff is the Conversion Manager for Hanlon Investment Management, Inc., a software company since July 20, 2009. He spends 90% of his time with this firm doing support use of their software application and compensated as a W2 employee.

He is also a registered administrative representative with Triad Advisors. Triad Advisors is a Broker/Dealer located in Atlanta, GA and he devotes 5% of his time.

Other than what is discussed above, Ryan P. Jotkoff is not actively engaged in any other investment-related business or occupation, nor does he have an application pending to register as a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or as an associated person of an FCM, CPO, or CTA.

Additionally, Ryan P. Jotkoff is not actively engaged in any other business or occupation for compensation, nor is he actively engaged in any other business activity or activities that provides a substantial source of income or involves a substantial amount of his time.

Item 5- Additional Compensation

Ryan P. Jotkoff does not receive economic benefit, including sales awards, other prizes, and any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts, for providing advisory services.

Item 6 - Supervision

As a member of FINRA, Triad Advisors is obligated to perform certain supervisory functions with respect to the activities of its registered representatives. Those supervisory responsibilities extend to the review of the investment advisory activities of representatives who, like the

representatives of **JFS**, are engaged in advisory activities separate and apart from Triad Advisors. In consideration for those supervisory functions, **JFS** and its advisory representatives may pay Triad Advisors a portion of the advisory fees they receive.

Item 7- Requirements for State-Registered Advisers

Ryan P. Jotkoff has not been involved in any arbitration claims or any civil, self-regulatory organization or administrative proceeding involving investment advisory business or activities. In addition, Ryan P. Jotkoff is not currently, nor at any time been the subject of a bankruptcy petition.