

# Form ADV

## Part 2B – Supplemental Brochure for...

Lee Frush

2018

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This brochure supplement (“Supplement”) has been prepared by Cornerstone Financial, LLC (“CF”) and it provides information about the qualifications and background of the supervised person named above, hereinafter referred to as “Mr Frush.” You should review this Supplement in conjunction with Part 2A of our Form ADV, also known as our “Brochure.” You should have already received a copy of our brochure and if not or if you have questions about anything in this Supplement, please contact us at (404) 874-3111 or lfrush@cornerstonefinancial.com.

Additional information about CF or any of our supervised persons (who are registered under our firm) is also available on the SEC’s Investment Adviser Public Disclosure (“IAPD”) which can be found at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The format/layout of this Supplement has been dictated by the SEC and/or The State of GA addressed in this Supplement as set forth in the instructions and guidance issued by the SEC in regard to Part 2B of the Form ADV. CF’s response to each such item shall immediately follow each numbered item. We encourage any reader of this Supplement to also refer to the instructions and guidance related to Part 2B of the Form ADV. Throughout this Supplement, any references to “we,” “our,” “ours,” “us,” etc. are meant to refer to CF.

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

# Table of Contents

- II. Educational Background and Business Experience ..... 3
  - CFP ..... 3
- III. Disciplinary Information ..... 5
  - III.(A). Criminal or Civil Matters ..... 5
  - III.(B). Administrative Proceedings ..... 5
  - III.(C). Self-Regulatory Organization (“SRO”) Proceedings ..... 6
  - III.(D). Other Proceedings ..... 6
- IV. Other Business Activities ..... 7
  - IV.(A). Other Investment-Related Activities ..... 7
    - Securities brokerage and insurance activities ..... 7
  - IV.(B). Other Activities ..... 8
- V. Additional Compensation ..... 9
- VI. Supervision ..... 10

## II. Educational Background and Business Experience

Name: Lee Frush

Year of Birth: 1964

(Formal education after high school.)

Institution	Degree	Major Date(s)
Stetson University	BBA Bachelor Bus. Administration, Finance	1987

(Business background for the preceding five years.)

Entity	Position	Held Date(s)
Dempsey Lord Smith LLC.	Registered Representative	01/2014 to Present
Cornerstone Financial LLC.	Manager: Retirement & Benefit Funding	01/2013 to Present
Metropolitan Life Insurance Co.	Manager: Pension Separate Accounts	08/2007 to 10/2012
MetLife Securities Inc.	Registered Representative	08/2007 to 10/2012

## CFP

CFP – Certified Financial Planner, 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:** Completed 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 2000 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 Standard 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 the CFP® certification.

### III. Disciplinary Information

This portion of this Supplement is designed to provide you any pertinent information related to any disciplinary matters involving Mr. Frush. We are obligated to look back for a period of ten years unless more than ten years have elapsed since a particular disciplinary event but that we deem the matter significant enough that a reasonable person would find it material in evaluating Mr. Frush or our firm.

This information below is also available via the SEC's Investment Adviser Public Disclosure ("IAPD") which can be found at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

#### III.(A). Criminal or Civil Matters

Has Mr. Frush been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Mr. Frush:

Was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of an investment-related statute or regulation; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

#### III.(B). Administrative Proceedings

Has Mr. Frush been involved in an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Frush:

Was found to have caused an investment-related business to lose its authorization to do business; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority:		
denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
barring or suspending the supervised person's association with an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
otherwise significantly limiting the supervised person's investment-related activities; or imposing a civil money penalty of more than \$2,500 on the supervised person?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

### III.(C). Self-Regulatory Organization ("SRO") Proceedings

Has Mr. Frush been involved in a SRO proceeding in which Mr Frush:

Was found to have caused an investment-related business to lose its authorization to do business; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

### III.(D). Other Proceedings

Has Mr. Frush been involved in any other proceeding in which a professional attainment, designation, or license of Mr. Frush's was revoked or suspended as a result of a violation of rules relating to professional conduct?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
In relation to the preceding item, did Mr. Frush resign or otherwise relinquish a professional attainment, designation, or license in anticipation of such a proceeding?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

## IV. Other Business Activities

### IV.(A). Other Investment-Related Activities

Mr. Frush is engaged in the following investment-related business activities outside the scope of his investment advisory activities on behalf of CF. For any listed activity, we will name the other entity and we will also describe the relationship, if any, between our advisory business and each particular activity. We will also address any conflicts of interest that may arise in relation to such outside activity(s) as well as any particulars surrounding Mr. Frush's receipt of any compensation in connection with such activities.

#### **Securities brokerage and insurance activities**

*Other entity:* Dempsey Lord Smith LLC.

*Relationship/Conflicts/Compensation:* Mr. Frush is licensed to sell certain securities and investment products through Dempsey Lord Smith LLC. ("DLS"), a FINRA member broker-dealer registered with the SEC. DLS is also registered with the SEC as an investment adviser, however, all of Mr. Frush's investment advisory activities are carried out under CF. Mr. Frush's activities through DLS are independent from and in addition to those of CF. CF and DLS are not affiliated entities. Mr. Frush may also offer insurance products as an insurance agent. While Mr. Frush does some of his insurance business through The Palmer Agency, he can choose anywhere to do his insurance business. CF and The Palmer Agency are not affiliated entities.

Mr. Frush also receives additional compensation in relation to the sale of securities or other investment products. Such compensation is in the form of cash. The instructions in the Form ADV require us to tell you that the receipt or potential for the receipt of this other compensation gives Mr. Frush an incentive to recommend investment products based on the compensation received, rather than on your specific needs. Although we are obligated to tell you this, both Mr. Frush's and our objective as a firm is to place nothing before your best interests.

Mr. Frush, in his capacity as a registered representative of DLS, may recommend DLS's brokerage to clients who have or are utilizing CF's investment advisory services. CF's clients are free to implement advisory recommendations through any firm. There is no obligation to effect transactions through DLS or Mr. Frush, however, if you choose to do so, commissions may be earned by Mr. Frush which may be higher or lower than those you might pay at another broker-dealer. CF does not warrant or represent that commissions for transactions implemented through DSL will be lower than commission available if you use another brokerage firm. CF believes, however, that the overall level of services and support provided to clients by CF outweighs the potentially lower transaction cost available under other brokerage arrangements.

CF may make conflicting or differing recommendations with respect to the same securities or insurance products to different advisory clients. All such recommendations are based on each individual client's financial circumstances, needs, risk tolerances, objectives, etc.

*How we Address the Conflict(s):* First and foremost, we address the conflicts described in the preceding section by disclosing them to you in this Brochure Supplement as well as in CF's separate Brochure. As a matter of general policy, we aggressively discourage activities that put your interests anywhere but first. Additionally, we have instituted a comprehensive supervisory process, detailed in our Written Supervisory Procedures ("WSPs") that was designed to address, among other things, conflicts of interest such as this one. In addition, we have designated "Investment-related" means "activities that pertain to securities, commodities, banking, insurance, or real estate (including, but not limited to, acting as or being associated with an investment adviser, broker-dealer, municipal securities dealer, government securities broker or dealer, issuer, investment company, futures sponsor, bank, or savings association)."

Chief Compliance Officer, as set forth on Schedule A of our Form ADV, to be the party responsible for the overall application and oversight of our supervisory process and our WSPs. Our Chief Compliance Officer has the authority to

delegate certain supervisory responsibilities to other supervised persons within our firm in order to ensure that our overall system of supervision is being adequately carried out and in a timely manner.

The potential conflicts of interest described in the preceding section are commonplace in the investment industry and we believe that they are not only appropriate but that they are proper in light of the added examination, licensing, registration, and other regulatory oversight that also takes place in the brokerage and insurance portions of the investment industry. Mr. Frush has satisfied various regulatory examination and registration requirements that allow not only for the offering of brokerage and insurance products as well as the receipt of the normal and customary compensation that any similarly registered, licensed, and qualified person could receive in the form of sales compensation for those same products.

The added compensation received by Mr. Frush in connection with any brokerage or insurance activities is deemed routine and customary compensation for such activities and is not believed to be inappropriate.

#### **IV.(B). Other Activities**

Other than as described above in IV.(A), Mr. Frush is not engaged in any activities outside the scope of his investment advisory activities on behalf of CF.

## V. Additional Compensation

The purpose of this Item is to describe any additional compensation (outside that which has been described above in Section IV.(A).) that Mr. Frush may receive in addition to her normal compensation for the investment advisory services he/she performs under our firm. As applicable, such other forms of compensation are denoted in the following grid. Please note that regular bonuses paid by us as part of Mr. Frush's normal and customary compensation are not considered "additional compensation" for the purpose of this Item.

Type of Compensation	
<input type="checkbox"/>	Sales awards or other prizes.
<input type="checkbox"/>	Bonus based, at least in part, on the number or amount of sales/transactions.
<input type="checkbox"/>	Bonus based, at least in part, on client referrals.
<input type="checkbox"/>	Bonus based, at least in part, on the # or type of new accounts opened.
<input checked="" type="checkbox"/>	None

## VI. Supervision

As part of our overall compliance and supervisory process, we monitor the advisory activities of all of our supervised persons. As part of the supervisory process over the advisory activities of all of our supervised persons, Mr. Frush Mr. Frushs' Designated Supervisor (Identified Below), shall carry out the general supervisory steps:

- Periodic review of customer account activity
- Periodic review of electronic and other correspondence
- Observation during client meetings and/or phone calls
- On-site inspection of each or our supervised person's office location (if other than the our main office)

In order to ensure that we are effectively and consistently carrying out our supervisory process over all of our supervised persons' advisory activities, we maintain a set of Written Supervisory Procedures ("WSP") that, among other things, address matters such as supervision of the activities of our supervised persons like Mr. Frush. Our WSP manual is the guiding force behind all of our supervisory functions and is subject to the regular inspection by any regulatory bodies having jurisdiction over our investment advisory activities.

**Mr. Frush's Designated Supervisor:**

Donald M. Dusick, Jr  
President/CCO  
(404) 874-3111