Context Financial LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Context Financial LLC. If you have any questions about the contents of this brochure, please contact us at (859) 514-1999 or by email at: josh@contextfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Context Financial LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Context Financial LLC's CRD number is: 281812.

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Registration does not imply a certain level of skill or training.

Version Date: 08/31/2020

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Context Financial LLC on January 14, 2019 are described below. Material changes relate to Context Financial LLC's policies, practices or conflicts of interests.

- Context Financial LLC has updated their hourly refund policy for Financial Planning fees. (Item 5.D)
- Context Financial LLC is now assuming discretionary authority over client's accounts (Item 16).
- Context Financial LLC has received a Paycheck Protection Program Loan (Item 18).

Item 3: Table of Contents

Item 4: Advisory Business

A. Description of the Advisory Firm

Context Financial LLC (hereinafter "CFL") is a Limited Liability Company organized in the State of Kentucky. The firm was formed in November 2006 and became licensed as an investment adviser in January 2016. The principal owners are Josh Ackerman and Thomas Ackerman.

B. Types of Advisory Services

Portfolio Management Services

CFL offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. CFL creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

CFL evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

CFL seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of CFL's economic, investment or other financial interests. To meet its fiduciary obligations, CFL attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, CFL's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is CFL's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Financial Planning Services

Financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. CFL's ongoing financial planning services will include client meetings throughout the year, periodic updated financial planning reports delivered to clients, and continuing availability for consultation with CFL.

Services Limited to Specific Types of Investments

CFL generally limits its investment advice to mutual funds, insurance products including annuities and ETFs. CFL may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

CFL offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent CFL from properly servicing the client account, or if the restrictions would require CFL to deviate from its standard suite of services, CFL reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. CFL does not participate in any wrap fee programs.

E. Assets Under Management

CFL has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$0.00	$22,175,476.00	December 2019

Item 5: Fees and Compensation

A. Fee Schedule

Asset-Based Fees for Portfolio Management

Total Assets Under Management	Annual Fee
$0 - $2,000,000	1.25%
$2,000,001 – And Up	0.70%

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of CFL's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

CFL uses the value of the account as of the last business day of the billing period, for purposes of determining the market value of the assets upon which the advisory fee is based. Quarterly fee calculation: Annual Fee X (# of days in quarter/365) = Quarterly Rate AUM x Quarterly Rate = Quarterly Fee.

Financial Planning Fees

Clients may choose from the financial planning arrangements set forth below.

Monthly Fees (ongoing engagement): The negotiable monthly fee for ongoing financial planning services is between $150 and $200 per month.

Fixed Fees (discrete engagement): The negotiable fixed rate for creating a one-time client financial plans is between $500 and $4,000 for the financial plan.

Hourly Fees (discrete engagement): The negotiable hourly fee for a discrete financial planning engagement is between $150 and $250 per hour.

Clients may terminate the agreement without penalty for a full refund of CFL's fees within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Asset-Based Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization or may be invoiced and billed directly to the client; clients may select the method in which they are billed. Fees are paid quarterly in arrears.

Payment of Financial Planning Fees

Ongoing monthly financial planning fees are paid via check or wire in advance, but never more than six months in advance.

Fixed financial planning fees are paid via check or wire in arrears upon completion.

Hourly financial planning fees are paid via check or wire 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by CFL. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

CFL collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client’s account.

Upon cancellation of the financial plan agreement, the fee will be prorated by taking the monthly fee, dividing it by the number of days in the month to determine the daily fee. The firm will then issue a refund for the remaining days in the month that services were not provided.

A refund will be provided for any work that has not been performed for any monthly fees collected in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither CFL nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

CFL does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

CFL generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals

There is no account minimum for any of CFL's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

CFL's methods of analysis include fundamental analysis and modern portfolio theory.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

CFL uses long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither CFL nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither CFL nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Joshua Keith Ackerman is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CFL always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of CFL in connection with such individual's activities outside of CFL.

Brian Keith Cohoon is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Context Financial LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Context Financial LLC in their capacity as a licensed insurance agent.

Brian Keith Cohoon is an Executive Wealth Advisor & Chief Strategic Officer at First Bankers Trust Co. He works with individuals on financial & estate planning, trust services, investment management, retirement plan services and tax planning. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Context Financial LLC always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any representative of Context Financial LLC in such individual’s outside capacities.

Brian Keith Cohoon is a Senior Planned Giving Consultant at Ashley/ Rountree & Associate. He work with nonprofits on developing and growing their charitable estate planning and planned giving programs.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

CFL may direct clients to third-party investment advisers. CFL will be compensated via a fee share from the advisers to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that CFL has an incentive to direct clients to the third-party investment advisers that provide CFL with a larger fee split. CFL will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. CFL will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where CFL is recommending the adviser to clients.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

CFL has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. CFL's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

CFL does not recommend that clients buy or sell any security in which a related person to CFL or CFL has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of CFL may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of CFL to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. CFL will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client’s disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of CFL may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of CFL to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, CFL will never engage in trading that operates to the client's disadvantage if representatives of CFL buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on CFL's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent.

CFL will require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.

1. Research and Other Soft-Dollar Benefits

CFL does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits").

2. Brokerage for Client Referrals

CFL receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

CFL does not trade client's accounts.

B. Aggregating (Block) Trading for Multiple Client Accounts

CFL does not trade clients' accounts and therefore does not have the ability to block trade purchases across accounts.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for CFL's portfolio management services provided are reviewed at least quarterly by Joshua Ackerman, Partner & CCO, with regard to clients' respective investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Joshua Ackerman, Partner & CCO. For ongoing financial planning clients, review will be conducted at least quarterly.

All accounts at CFL are assigned to this reviewer.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews for clients with ongoing services may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to discrete financial plans, CFL's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each portfolio management client will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees.

Each financial planning client will receive a written financial plan.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

CFL may receive compensation from third-party advisers to which it directs clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

CFL does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, CFL will (i) maintain client written authorization and (ii) send to the custodian and the client an itemized fee invoice, detailing the formula used to calculate the fee, the assets under management the fee was based on, and the time period covered by the fee. By complying with these safeguards, CFL will not be deemed to have custody of client's assets due to direct fee deduction. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

CFL provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, CFL generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share. In some instances, CFL's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to CFL).

CFL will also have discretionary authority to determine the broker dealer to be used for a purchase or sale of securities for a client's account.

Item 17: Voting Client Securities (Proxy Voting)

CFL will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

CFL neither requires nor solicits prepayment of more than $500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

In light of the COVID-19 coronavirus and historic decline in market values, CFL has elected to participate in the CARES Act's Paycheck Protection Program ("PPP") to strengthen its balance sheet. CFL intends to use this loan predominantly to continue payroll for the firm and may ultimately seek loan forgiveness per the terms of the PPP. Due to this and other measures taken internally, CFL has been able to operate and continue serving its clients. As of April 2020 CFL, received a loan in the amount of $3,600.00. CFL will be asking for forgiveness on the loan. The amount was used to pay for administrative assistant's salary

C. Bankruptcy Petitions in Previous Ten Years

CFL has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

CFL currently has the following management persons/executive officer: Joshua Keith Ackerman and Thomas Ackerman, owner. Education and business background for Joshua Keith Ackerman can be found on the Form ADV Part 2B brochure supplement for such individual.

Thomas Ackerman received his education from Seattle University and Simpson College. He has been in the financial industry since 1980.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for Joshua Keith Ackerman can be found on the Form ADV Part 2B brochure supplement.

Thomas Ackerman currently spends less than 10 percent of his time selling fixed insurance products.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

CFL does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.