



# INNOVATIVE ADVISORY GROUP

## BROCHURE SUPPLEMENT Version 2019

Corporate Office Address

394 LOWELL STREET, SUITE 8  
LEXINGTON, MA 02420

Website: <http://www.innovativewealth.com>

Last Updated: **FEBRUARY 28, 2019**

This brochure supplement provides information about the qualifications of supervised persons of INNOVATIVE ADVISORY GROUP, LLC. You should have received a copy of INNOVATIVE ADVISORY GROUP, LLC's Firm Brochure. If you have not received a copy of the firm brochure or have any questions about the contents of this brochure supplement, please contact us at (781) 218-2250 or by electronic mail at [legal@innovativewealth.com](mailto:legal@innovativewealth.com). Except where indicated, the information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any equivalent state securities authority.

Additional information about each supervised person of INNOVATIVE ADVISORY GROUP, LLC is also available on the United States Securities and Exchange Commission website at <http://www.advisorinfo.sec.gov>. Please do note that INNOVATIVE ADVISORY GROUP, LLC is not responsible for maintenance or management of this website.

## Material Changes

March 30, 2011	Initial Revision; 2010 Annual Update in Brochure Format
October 01, 2011	Added Additional Office Address on Cover Page Updated Version number to 1.1 Added Section numbers to each investment advisor representative Added Section 1.7, 2.7, 3.7, 4.7, 5.7, 6.7 to each section Updated Other Business Activities Section for clarity (as applicable) Updated Additional Compensation Section for clarity (as applicable) Removed Mr. Mark Prideaux Added Mr. Odias Bachelder II
December 13, 2011	Removed Mr. Steven Cox Updated Version number to 1.2
March 12, 2012	Added Contact information for each investment advisor representative Added Satellite Office Information for Maine based investment advisor representative Updated Other Business Activities for <a href="#">Mr. Rajeev Kotyan</a> , Ms. Fumiji Aoki and Mr. George Zuluaga Removed older business experience information for Ms. Fumiji Aoki and Mr. Odias Bachelder II Added Additional Compensation information for <a href="#">Mr. Kirk Chisholm</a> Updated Version number to 1.3
July 02, 2012	Updated Copyright information to include 2012 Added Other Business Activity for Mr. Odias Bachelder II Added Other Business Activity for Ms. Fumiji Aoki Updated Version number to 1.4
August 20, 2012	Changed Supervision for Ms. Laurie Bachelder Changed Other Business Activity for <a href="#">Mr. Rajeev Kotyan</a> Changed Supervision for Mr. George Zuluaga Changed Supervision for Ms. Fumiji Aoki Updated Version number to 1.5
October 16, 2012	Removed Ms. Laurie Bachelder Removed Mr. Odias Bachelder II Changed Version number to 1.6
January 28, 2013	Changed Version number to 1.7 Updated Copyright information to include 2013 Removed Mr. George Zuluaga Changed Other Business Activity for <a href="#">Mr. Rajeev Kotyan</a> Changed Registered Office Address on Cover Page
June 03, 2013	Changed Version number to 2.0 Changed NUA Advisors, LLC to NUA Advisors throughout Updated Business experience for <a href="#">Mr. Rajeev Kotyan</a> to reflect last 5 years only Updated Additional Compensation for <a href="#">Mr. Kirk Chisholm</a> to reflect the 2013 Five Star Award
September 26, 2013	Changed Version number to 2.1 Removed Registered Office Address on Cover Page

March 14, 2014 Changed Version number to 2.3; Updated Copyright notice; Updated Address  
Updated Business Experience for Mr. [Kirk Chisholm](#) and Mr. [Rajeev Kotyan](#)

August 01, 2014 Changed to Version 3.0  
Changed NUA Advisors to Innovative Advisory Group, LLC

January 02, 2014 Changed to Version 3.1; Updated Copyright notice  
Updated Other Business Activity for [Mr. Kirk Chisholm](#)

February 05, 2015 Changed to Version 3.2  
Added clarity to Disciplinary Information for [Mr. Kirk Chisholm](#)  
Added clarity to Disciplinary Information for [Mr. Rajeev Kotyan](#)  
Added clarity to Disciplinary Information for Ms. Fumiji Aoki  
Updated Other Business Activity for [Mr. Kirk Chisholm](#)  
Updated Other Business Activity for [Mr. Rajeev Kotyan](#)

February 22, 2016 Changed to Version 3.3; Updated Copyright notice  
Updated Other Business Activity for [Mr. Rajeev Kotyan](#)  
Updated Other Business Activity for Ms. Fumiji Aoki

May 25, 2016 Changed to Version 3.4  
Updated Additional Compensation for [Mr. Kirk Chisholm](#)  
Updated Additional Compensation for [Mr. Rajeev Kotyan](#)

September 12, 2016 Changed to Version 3.5  
Removed Ms. Fumiji Aoki

February 22, 2017 Changed to Version 3.6; Updated Copyright notice

February 15, 2018 Changed to Version 3.8; Updated Copyright notice  
Corrected typographical and grammatical errors

March 23, 2018 Changed to Version 3.9  
Updated Other Business Activity for [Mr. Kirk Chisholm](#)  
Updated Supervision for [Mr. Kirk Chisholm](#)  
Updated Other Business Activity for [Mr. Rajeev Kotyan](#)  
Updated Supervision for [Mr. Rajeev Kotyan](#)

April 23, 2018 Changed to Version 4.0  
Added [Mr. Timothy Picciott](#)

June 01, 2018 Changed to Version 4.1  
Corrected designation for [Mr. Timothy Picciott](#)

July 27, 2018 Changed to Version 4.2  
Updated primary office address for [Mr. Timothy Picciott](#)

February 28, 2019 Changed to Version 2019; Updated Copyright notice

## Table of Contents

1.	Kirk Chisholm .....	5
1.1	General Information .....	5
1.2	Education Background and Business Experience .....	5
1.3	Disciplinary Information .....	5
1.4	Other Business Activity.....	5
1.5	Additional Compensation.....	5
1.6	Supervision .....	6
1.7	Requirements for State Registered Advisors .....	6
2	Rajeev Kotyan.....	7
2.1	General Information .....	7
2.2	Education Background and Business Experience .....	7
2.3	Disciplinary Information .....	7
2.4	Other Business Activity.....	7
2.5	Additional Compensation.....	7
2.6	Supervision .....	7
2.7	Requirements for State Registered Advisors .....	8
3.	Timothy Picciott .....	9
3.1	General Information .....	9
3.2	Education Background and Business Experience .....	9
3.3	Disciplinary Information .....	10
3.4	Other Business Activity.....	10
3.5	Additional Compensation.....	11
3.6	Supervision .....	11
3.7	Requirements for State Registered Advisors .....	11

## 1. Kirk Chisholm

### 1.1 General Information

Individual CRD#	4004975
Year of Birth	1975
Primary Office Address	394 Lowell Street, Suite 8 Lexington, MA 02420
Contact Information	(617) 372-9033

### 1.2 Education Background and Business Experience

Trinity College Bachelor of Arts in Economics

Business Experience for the last 5 years only:

Innovative Advisory Group, LLC Principal November 2008 to Present

### 1.3 Disciplinary Information

There have been no legal or disciplinary events for, against and by Mr. Kirk Chisholm.

### 1.4 Other Business Activity

Mr. Chisholm is monetarily invested (minor investment, directly and/or indirectly) in Cambria Investments Holdings, LLC. Cambria Investments Holdings, LLC creates and manages Exchange Traded Funds (ETFs). Mr. Chisholm's investment does not provide for any management or control of Cambria Investments Holdings, LLC. Other than the return of investment, Mr. Chisholm does not receive any compensation, discounts or other benefits, either directly or indirectly, due to his investment in Cambria Investments Holdings, LLC. This may cause a potential conflict of interest in the portfolio allocation of ETFs provided by Cambria Investments Holdings, LLC. Additional supervision prior to portfolio allocation in Cambria Investments Holdings, LLC ETFs is provided to limit any potential conflict of interest.

Mr. Kirk Chisholm is the non-compensated manager of Self Direct Your Retirement, LLC, which is a personal holding company solely for estate planning for his family and himself and does not conduct any financial services related business through this firm.

Mr. Kirk Chisholm has ownership and management interests in Harrington Eight, LLC. Harrington Eight, LLC is the owner of the office space leased by Innovative Advisory Group, LLC. Harrington Eight, LLC does not provide any investment related services.

Mr. Kirk Chisholm is the sole owner and managing member of Stirling Global Advisor, LLC, the personal holding company of Mr. Kirk Chisholm, which is an owner of Innovative Advisory Group, LLC.

### 1.5 Additional Compensation

Mr. Chisholm received an award from the Five Star Professional in February 2010 naming him as a 2010 Five Star Wealth Manager in Boston Magazine. This is an unsolicited, unpaid recognition of Mr. Chisholm's wealth management service provided to his clients. Prior to being selected for the award Mr. Chisholm has had no communication with this firm.

Mr. Chisholm received an award from the Five Star Professional in February 2012 naming him as a 2012 Five Star Wealth Manager in Boston Magazine. This is an unsolicited, unpaid recognition of Mr. Chisholm's wealth management service provided to his clients. Prior to being selected for the award Mr. Chisholm has had no communication with this firm.

Mr. Chisholm received an award from the Five Star Professional in February 2013 naming him as a 2013 Five Star Wealth Manager in Boston Magazine. This is an unsolicited, unpaid recognition of Mr. Chisholm's wealth management service provided to his clients. Prior to being selected for the award Mr. Chisholm has had no communication with this firm.

Mr. Chisholm received an award from the Five Star Professional in February 2015 naming him as a 2015 Five Star Wealth Manager in Boston Magazine. This is an unsolicited, unpaid recognition of Mr. Chisholm's wealth management service provided to his clients. Prior to being selected for the award Mr. Chisholm has had no communication with this firm.

Mr. Chisholm received an award from the Five Star Professional in February 2016 naming him as a 2016 Five Star Wealth Manager in Boston Magazine. This is an unsolicited, unpaid recognition of Mr. Chisholm's wealth management service provided to his clients. Prior to being selected for the award Mr. Chisholm has had no communication with this firm.

Innovative Advisory Group, LLC is not affiliated and has no arrangements with Five Star Professional and their award.

Other than the compensation from Innovative Advisory Group, LLC, Mr. Chisholm does not receive any economic benefit from any person, company, or organization in exchange for providing client advisory services through Innovative Advisory Group, LLC.

## **1.6 Supervision**

Mr. Chisholm is a Management Person of Innovative Advisory Group, LLC. As a check and balances the other Management Persons of the company provide oversight on the advice provided to clients, including but not limited to portfolio reviews, financial plan reviews and client needs discussions.

Mr. Kirk Chisholm is supervised by Mr. Rajeev Kotyan, Principal and Chief Compliance Officer and can be reached at (781) 577-2782. Mr. Rajeev Kotyan is also a Management Person at Innovative Advisory Group, LLC.

## **1.7 Requirements for State Registered Advisors**

Mr. Chisholm is a State Registered Investment Advisor Representative, due to the fact that Innovative Advisory Group, LLC is a State Registered Investment Advisory Firm. States require that additional disciplinary disclosures pertaining to arbitration claims; civil, self-regulatory or administrative proceedings; or bankruptcy proceeding have to be disclosed in addition to the [Disciplinary Information \(Section 1.3\)](#) provided. Mr. Chisholm has no additional information to disclose.

## 2 Rajeev Kotyan

### 2.1 General Information

Individual CRD#	5479610
Year of Birth	1970
Primary Office Address	394 Lowell Street, Suite 8 Lexington, MA 02420
Contact Information	(781) 577-2782

### 2.2 Education Background and Business Experience

University of Poona Bachelor of Engineering (Computers, Finance – minor)

Business Experience for the last 5 years only:

Innovative Advisory Group, LLC	Principal	July 2008 to Present
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### 2.3 Disciplinary Information

There have been no legal or disciplinary events for, against and by Mr. Rajeev Kotyan

### 2.4 Other Business Activity

Mr. Rajeev Kotyan is the sole owner and president of Blue Haven Group, Inc., the personal holding company of Mr. Rajeev Kotyan, which is an owner of Innovative Advisory Group, LLC.

Mr. Rajeev Kotyan has ownership and management interests in Harrington Eight, LLC. Harrington Eight, LLC is the owner of the office space leased by Innovative Advisory Group, LLC. Harrington Eight, LLC does not provide any investment related services.

Mr. Rajeev Kotyan is on the Board of Trustees for the Harrington Park Condominium Association. This is a non-compensated position for the purposes of management of the Harrington Park Condominiums.

### 2.5 Additional Compensation

Mr. Kotyan received an award from the Five Star Professional in February 2016 naming him as a 2016 Five Star Wealth Manager in Boston Magazine. This is an unsolicited, unpaid recognition of Mr. Kotyan's wealth management service provided to his clients. Prior to being selected for the award Mr. Kotyan has had no communication with this firm.

Innovative Advisory Group, LLC is not affiliated and has no arrangements with Five Star Professional and their award.

Other than the compensation from Innovative Advisory Group, LLC, Mr. Kotyan does not receive any economic benefit from any person, company, or organization in exchange for providing client advisory services through Innovative Advisory Group, LLC.

### 2.6 Supervision

Mr. Kotyan is a Management Person of Innovative Advisory Group, LLC. As a check and balances the other Management Persons of the company provide oversight on the advice provided to clients, including but not limited to portfolio reviews, financial plan reviews and client needs discussions.

Mr. Rajeev Kotyan is supervised by Mr. Kirk Chisholm, Principal and can be reached at (617) 372-9033. Mr. Kirk Chisholm is also a Management Person at Innovative Advisory Group, LLC.

## **2.7 Requirements for State Registered Advisors**

Mr. Kotyan is a State Registered Investment Advisor Representative, due to the fact that Innovative Advisory Group, LLC is a State Registered Investment Advisory Firm. States require that additional disciplinary disclosures pertaining to arbitration claims; civil, self-regulatory or administrative proceedings; or bankruptcy proceeding have to be disclosed in addition to the [Disciplinary Information \(Section 2.3\)](#) provided. Mr. Kotyan has no additional information to disclose.



### 3. Timothy Picciott

#### 3.1 General Information

Individual CRD#	5535180
Year of Birth	1986
Primary Office Address	16165 N 83 <sup>rd</sup> Avenue, Suite 200 Peoria, AZ 85382
Contact Information	480-420-4659

#### 3.2 Education Background and Business Experience

State University of New York Genesco Bachelor of Science in Business Administration

Business Experience for the last 5 years only:

Innovative Advisory Group, LLC	April 2018 to Present
Wealthcare Advisory Partners, LLC	November 2015 to February 2018
LPL Financial, LLC	November 2015 to February 2018
Waddell & Reed	September 2008 to November 2015

Mr. Picciott is a Certified Financial Planner<sup>™</sup> (CFP<sup>®</sup>), both marks and designations owned by the Certified Financial Planner Board of Standards, Inc. (CFP<sup>®</sup> Board)

To receive the Certified Financial Planner<sup>™</sup> designation, the candidate must have completed the following requirements:

- Bachelor's Degree from an accredited college or university
- CFP<sup>®</sup> Board Registered Education Program
- Pass the CFP<sup>®</sup> Certification Examination
- Three years of full-time or equivalent part-time direct financial planning work experience
- Pass CFP<sup>®</sup> Board's Fitness Standards for Candidates and Registrants
- Abide by the CFP<sup>®</sup> Board's Code of Ethics and Professional Responsibility, Rules of Conduct and Financial Planning Practice Standards
- Pass all Continuing Education requirements on an annual basis

More information on CFP<sup>®</sup> Board is available at <http://www.cfp.net>. (*Innovative Advisory Group, LLC does not maintain or manage the contents of this website.*)

Innovative Advisory Group, LLC is not affiliated with CFP<sup>®</sup> Board.

Mr. Picciott is a Chartered Retirement Planning Counselor<sup>SM</sup> (CRPC<sup>®</sup>), both marks and designations owned by The College for Financial Planning, Inc.

To receive the Chartered Retirement Planning Counselor<sup>SM</sup>, the candidate must have completed the following requirements:

- Course of study encompassing pre- and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations.
- Pass an examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations

- Abide by the Standards of Professional Conduct as published by The College for Financial Planning, Inc.
- Pass all renewal, continuing education and self disclosure requirements of The College for Financial Planning, Inc.

More information about Chartered Retirement Planning Counselor<sup>SM</sup> (CRPC<sup>®</sup>) is available at <http://www.cffpdesignations.com/Designation/CRPC> (*Innovative Advisory Group, LLC does not maintain or manage the contents of this website.*)

Innovative Advisory Group, LLC is not affiliated with The College for Financial Planning, Inc.

### 3.3 Disciplinary Information

There have been no legal or disciplinary events for, against and by Mr. Timothy Picciott.

### 3.4 Other Business Activity

Mr. Timothy Picciott is the manager and member of Ironplan, LLC, which is a personal holding company solely for estate planning and tax planning for his family and himself and does not conduct any financial services related business through this firm.

Mr. Timothy Picciott is the manager and member in The Libertarian Advisor, LLC, which is the personal holding company for intellectual property rights, including but not limited to trademarks, service marks and copyrights for the sole benefit of Mr. Timothy Picciott and his family. The Libertarian Advisor, LLC may sell non-finance related merchandise. The Libertarian Advisor, LLC does not provide any investment or financial related services.

Mr. Timothy Picciott is the manager and member in Crypto Wealth Advisors, LLC, which is the personal holding company for digital assets and rights, including but not limited to URL's, blockchain technology, crypto currency and their related digital trademarks, service marks and copyrights for the sole benefit of Mr. Timothy Picciott and his family. Crypto Wealth Advisor, LLC does not provide any investment or financial related services.

Mr. Timothy Picciott is the Statutory Resident Agent, as defined by the Arizona Corporations Commission Corporations Division, for Innovative Advisory Group, LLC in the State of Arizona.

Mr. Timothy Picciott is an Independent Insurance Producer in the State of Arizona (Insurance License #: 11162714). This license is specific to Mr. Picciott, and details of the license information are available only directly with Mr. Picciott or with the [State of Arizona Department of Insurance](#). (*Innovative Advisory Group, LLC is not responsible for the content of the State of Arizona, Department of Insurance website, nor is it responsible for the insurance license or insurance license status for Mr. Picciott.*)

As an independent insurance producer, Mr. Picciott may receive compensation for the sale of insurance products. Sales of insurance products for compensation creates a conflict of interest for Mr. Picciott since it gives him an incentive to recommend insurance products based on the compensation received, rather than on the client's needs. Innovative Advisory Group, LLC will supervise insurance products that are recommended by Mr. Picciott to advisory clients as part of a financial plan to limit this conflict of interest.

Innovative Advisory Group, LLC does not receive any compensation from Mr. Picciott's Other Business Activities listed here, nor does Innovative Advisory Group, LLC provide any support to Mr. Picciott's Other Business Activities.

### 3.5 Additional Compensation

Mr. Picciott may receive compensation from his activity in The Libertarian Advisor, LLC and Crypto Wealth Advisor, LLC. None of this compensation is related to or dependent on investment or financial related services.

Mr. Picciott may receive compensation from his activity as the Statutory Resident Agent for Innovative Advisory Group, LLC. This compensation is not related to or dependent on investment or financial related services.

Mr. Picciott may receive compensation from his activity as an independent insurance producer.

Except as disclosed here, other than the compensation from Innovative Advisory Group, LLC, Mr. Picciott does not receive any economic benefit from any person, company, or organization in exchange for providing client advisory services through Innovative Advisory Group, LLC.

### 3.6 Supervision

All investment advice and financial planning material between Mr. Timothy Picciott and clients are sent to the Chief Compliance Officer or Innovative Advisory Group, LLC Management Person for review. All materials are maintained by Innovative Advisory Group, LLC.

Mr. Timothy Picciott is supervised by Mr. Kirk Chisholm, Principal and can be reached at (617) 372-9033. Mr. Kirk Chisholm is also a Management Person at Innovative Advisory Group, LLC.

### 3.7 Requirements for State Registered Advisors

Mr. Picciott is a State Registered Investment Advisor Representative, due to the fact that Innovative Advisory Group, LLC is a State Registered Investment Advisory Firm. States require that additional disciplinary disclosures pertaining to arbitration claims; civil, self-regulatory or administrative proceedings; or bankruptcy proceeding have to be disclosed in addition to the [Disciplinary Information \(Section 3.3\)](#) provided. Mr. Picciott has no additional information to disclose.