

Bullseye Investment Management, LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Bullseye Investment Management, LLC. If you have any questions about the contents of this brochure, please contact us at 513-774-3325 or by email at: tim@bullseyeinv.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 Bullseye Investment Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Bullseye Investment Management, LLC's CRD number is: 145158

Bullseye Investment Management, LLC

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Hartville, OH 44632

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

Version Date: 03/05/2019

Item 2: Material Changes

Material changes since ADV filed 1/24/2109

1-New office opened in Hartville Ohio

2-New Investment Advisory Representative added, Gregory M. Spickard, serving NE Ohio from the Hartville Office

Item 3: Table of Contents

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Item 4: Advisory Business

A. Description of the Advisory Firm

This firm has been in business since September 2007, and the owner is Timothy R. Guthrie.

B. Types of Advisory Services

Bullseye Investment Management, LLC (hereinafter "BIM") offers the following services to advisory clients:

Investment Supervisory Services

BIM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. BIM creates an Investment Policy Statement for each client, which outlines the client's current situation (investment goals, time horizon, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Trading
- Investment Policy Statement
- Asset selection
- Portfolio monitoring/Rebalancing

BIM 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 completed with each client.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are offered at no extra charge for asset management clients. Meetings with prospective clients may also involve discussions of these subjects, at no charge. There is no guarantee that financial plans will achieve the desired goals or that any future projections or estimates will be realized.

Bill Payment

BIM offers bill payment and related personal financial services to one client. BIM has no plans to offer these services to additional clients.

Services Limited to Specific Types of Investments

BIM limits its money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, publicly traded REITs, Closed End funds, UITs and government securities. BIM may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

BIM offers the same suite of services to all of its clients. However, specific client investment plans 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) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

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 BIM from properly servicing the client account, or if the restrictions would require BIM to deviate from its standard suite of services, BIM reserves the right to end the relationship.

D. Wrap Fee Programs

BIM does not participate in any wrap fee programs.

E. Amounts Under Management

BIM has the following assets under management:

| Discretionary Amounts: | Non-discretionary Amounts: | Date Calculated: |
|-------------------------------|-----------------------------------|-------------------------|
| \$38,787,241 | \$0.00 | 03/05/2019 |

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

| Total Assets Under Management | Annual Fee |
|-------------------------------|------------|
| \$1 - \$100,000 | 1.40% |
| \$100,001-\$400,000 | 1.30% |
| \$400,001 - \$800,000 | 1.1% |
| \$800,001+ | .85% |

These fees are negotiable, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees may be paid quarterly in advance, or monthly in advance at the discretion of BIM (BIM intends to transition to monthly fee billing), accounts with annual fees of less than \$500 will pay their fees annually. Client account fees may adjust (increase) if client adds assets to the account (computed on a pro-rata basis). Clients may terminate their contracts with thirty days' written notice. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination minus a \$50 calculation fee. Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid monthly in advance, currently for most clients, but BIM may charge accounts under \$40,000 annually.

Payment of Financial Planning Fees

Hourly Financial Planning fees are paid via check arrears upon completion. Because fees are charged in arrears, no refunds are given.

C. Clients Are Responsible For Third Party Fees

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

D. Prepayment of Fees

BIM collects fees in advance. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within thirty days to the client via check or deposited back into client's account, minus a \$50 calculation fee.

E. Outside Compensation For the Sale of Securities to Clients

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

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

BIM 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

BIM generally provides investment advice and/or management supervisory services to the following Types of Clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Corporations or Business Entities
- ❖ Retirement Plans

Minimum Account Size

There is no account minimum.

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

A. Methods of Analysis and Investment Strategies

BIM's methods of analysis include fundamental analysis and cyclical analysis.

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

Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security or favorable sectors.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear. Investments in securities can appreciate and depreciate, and no warranty or guarantee is offered or implied.

B. Material Risks Involved

BIM uses Long Term Purchases, Short Term Purchases and Trading strategies.

BIM utilizes investment strategies that are designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear. Investments in securities can appreciate and depreciate, and no warranty or guarantee is offered or implied.

C. Risks of Specific Securities Utilized

BIM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Mutual funds are recommended to most clients. Mutual fund asset values are based on the securities the fund owns. Mutual funds can own stocks, bonds or other securities that have risk, therefore mutual funds have risk of loss. These funds have all the risks of owning a portfolio of stocks, primarily, that the entire market, or particular holdings could lose value.

BIM also often recommend fixed income mutual funds. Fixed income mutual funds have interest rate risk, credit risk and other risks that owning a portfolio of fixed income securities would entail. Fixed income mutual funds can lose value, and clients can suffer losses in fixed income mutual funds under a variety of circumstances.

Exchange traded funds, (ETFs), Closed end funds, and UITs have the same market risk factors as mutual funds, with possible additional risks related to pricing during the trading day. Reasonable efforts will be made to minimize pricing risks for these securities.

Individual securities have the risks associated with their asset class and additional risks related to non-diversification. This would include individual stocks, bonds, and other securities such as preferred stocks or warrants.

Some mutual funds, ETFs, Closed End Funds, and UITs employ leverage (borrowed funds) in an attempt the increase growth or income. These products likely have more risk than similar products that do not use leverage and may have higher expenses.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear. Investments in securities can appreciate and depreciate, and no warranty or guarantee is offered or implied

Item 9: Disciplinary Information

At no time has BIM or its representatives been found liable for any damages or losses by any judicial, regulatory, or arbitration body. At the advice of BIM's liability insurance carrier's attorney, BIM, and its representatives have participated in a multi-party settlement to prevent the costs, time loss and risks of potential litigation or arbitration. A BIM client who was acting as a trustee was sued by a beneficiary of that trust, and the above parties choose to end this potential risk when able.

Item 10: Other Financial Industry Activities and Affiliations

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

Neither BIM nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

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

Neither BIM nor its representatives are registered as a FCM, CPO, or CTA.

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

Neither BIM nor its representatives hold other registration relationships, and receive no revenue from any other source other than management fees. BIM nor its representatives are not aware of any other conflicts of interest, and if they become aware of any conflict of interest, they will communicate this in both required filings and to clients.

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

BIM does not utilize nor select other advisors or third-party managers. All assets are managed by BIM management.

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

A. Code of Ethics

We have 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. Clients may request a copy of our Code of Ethics from management.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of BIM may buy or sell securities for themselves that they also recommend to clients. BIM will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold if the volume of the security traded by BIM or its representatives represents a significant percentage of the securities' daily trading volume or could reasonably be estimated to affect the price a client receives.

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

From time to time, representatives of BIM may buy or sell securities for themselves at or around the same time as clients. BIM will not trade non-mutual fund or non-ETF securities before trading the same security for clients, if the volume of the security traded by BIM could reasonably be estimated to affect the price a client receives.

Item 12: Brokerage Practices

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

The Custodian was chosen based on their transaction fees, access to investment markets and client facing services offered. BIM will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

1. *Research and Other Soft-Dollar Benefits*

BIM receives no research, product, or service other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits").

2. *Brokerage for Client Referrals*

BIM 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*

BIM will not allow clients to direct BIM to use a specific broker-dealer to execute transactions. Clients must use BIM recommended custodian (broker-dealer). Not all investment advisers require their clients to direct brokerage. By requiring clients to use our specific custodian, BIM may be unable to achieve most favorable execution of client transactions and this may cost clients money over using a lower-cost custodian. BIM recommends TD Ameritrade as the broker and custodian for clients currently.

B. Aggregating (Block) Trading for Multiple Client Accounts

BIM maintains the ability to block trade purchases across accounts. Block trading may benefit clients by purchasing larger blocks in groups. We do not feel that the clients are at a disadvantage due to the best execution practices of our custodian.

Item 13: Reviews of Accounts

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

Client accounts are reviewed at least quarterly by Timothy R. Guthrie. Tim Guthrie reviews clients' accounts with regards potential investment gains and losses, and their investment policies and risk tolerance levels. All accounts at IA are assigned to Tim Guthrie.

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

Reviews 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).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive a monthly or quarterly written report detailing the client's account which may come from the custodian.

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)

BIM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to BIM clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

BIM does pay marketing organizations for inclusion in internet marketing campaigns, and /or web site development and management, email campaigns, and inclusion in professional referral listing programs.

Item 15: Custody

BIM is a Trustee for one client and therefore has custody over the client's account. BIM will act in the best interest of the client in their role as the Trustee. BIM also provides bill payment services for one client and this access to the client's assets may also be considered custody.

Custody (with exceptions listed above) is limited to the ability to deduct fees directly from client accounts. Clients will receive account statements from the custodian and should carefully review those statements.

Item 16: Investment Discretion

BIM provides investment supervisory services for discretionary accounts. Clients do not approve transactions in advance. The Investment Policy Statement will govern the account asset allocation, security selection and strategy.

Item 17: Voting Client Securities (Proxy Voting)

BIM 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

BIM does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

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

Neither BIM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

BIM has not been the subject of a bankruptcy petition in the last ten years, or ever.

Item 19: Requirements For State Registered Advisers

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

BIM currently has one management person; Timothy R. Guthrie. His education and business background can be found on the Supplemental ADV Part 2B form.

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

Timothy R. Guthrie's other business activities can be found on the Supplemental ADV Part 2B form. At the present time, Tim Guthrie has no other business activities.

Gregory M. Spickard other business activities can be found on the Supplemental ADV Part 2B form. Greg Spickard is the President of Virtus Fiduciary Consulting, and this activity takes approx. 12% of his work week time. Virtus does not sell or offer investments or investment management services.

C. How Performance Based Fees are Calculated and Degree of Risk to Clients

BIM 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

No management person at BIM has been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

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

Neither BIM, nor its management persons, has any relationship or arrangement with issuers of securities.