

# **Raider Dennis Agency, Inc.**

**32770 Grand River Ave., Suite B200**

**Farmington, MI 48336**

**248-442-5000**

**www.raiderdennis.com**

## **Form ADV Part 2A Appendix 1 Wrap Fee Brochure**

**March 24, 2022**

This wrap fee program brochure provides information about the qualifications and business practices of Raider Dennis Agency. If you have any questions about the contents of this Brochure, please contact us at 248-442-5000 or via email at [pmendler@raiderdennis.com](mailto:pmendler@raiderdennis.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.

Raider Dennis Agency 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 that you may use to determine whether to hire or retain them.

Additional information about Raider Dennis Agency is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using a unique identifying number, known as CRD number. The CRD number for Raider Dennis Agency is 314415. The SEC's website also provides information about any persons affiliated with Raider Dennis Agency who are registered, or are required to be registered, as Investment Adviser Representatives of Raider Dennis Agency.

## Item 2 - Material Changes

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There were no material changes to the business since our initial filing on May 17, 2021.

In the future, this section of the brochure will discuss only the specific material changes that were made to the Brochure and will provide you with a summary of all material changes that have occurred since the last filing of this Brochure. This section will also identify the date of our last annual brochure update.

Currently, our Brochure may be requested at any time, without charge, by contacting Raider Dennis Agency at 248-442-5000.

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## Item 4 – Services, Fees and Compensation

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Raider Dennis Agency is a Registered Investment Adviser (“Adviser”) in the State of Michigan which offers this wrap fee program for its advisory clients. Initially registered as an Investment Adviser in 2021 in the State of Michigan. Raider Dennis Agency was founded by Jordan Raider in 1972 as an insurance agency and is wholly-owned by Stuart E. Raider and Peter Mendler.

We provide investment advice through Investment Adviser Representatives (“IAR”) associated with us. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on our behalf.

### Wrap Fee Program

We provide asset management services to individuals and businesses. Our focus is on helping you develop and execute plans that are designed to build and preserve your wealth. We currently provide our asset management services in investment programs that bundle or “wrap” services (investment advice, trade execution, custody, etc.) together and charge a single fee based on the value of assets under management.

This is a program that offers model portfolio selection services through AE Wealth Management, LLC (“AEWM” or “AE Wealth Management”), which allows AE Wealth Management and Raider Dennis Agency to exercise discretion to select model portfolios managed by the AEWM investment committee and/or third-party non-affiliated investment managers. An investment adviser representative will assist you in completing a client profile questionnaire and review the information you provide. We will then select the model portfolio(s) that aligns with your disclosed risk tolerance and investment objectives.

AEWM utilizes a third-party platform provider to effectuate model portfolios. The platform provider will be given discretionary authority to implement the selected model portfolio(s) and to trade your account based on information and/or signals provided by the manager(s) of the model portfolio(s). The platform provider will implement the model(s) for your account by acquiring the securities that are represented in the selected model portfolio(s). We will be available to answer questions that you may have regarding your account. We will have the ability to select the model portfolio(s) as well as the ability to reallocate funds from or to the model portfolio(s) and funds in other accounts over which you have granted us discretionary authority.

We will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information.

Based on the information you share with us, we will analyze your situation and recommend an appropriate Wrap Fee Program. You will be provided with a targeted strategic allocation of assets by class.

As part of our asset management services provided with our Wrap Fee program, we will:

- Review your present financial situation
- Monitor and track assets under management
- Provide portfolio statements, asset allocation statement, rebalanced statements as needed
- Advise on asset selection
- Provide research and information on performance and fund management changes
- Build a risk management profile for you
- Assist you in setting and monitoring goals and objectives
- Provide personal consultations as necessary upon your request or as needed.

You must notify us promptly when your financial situation, goals, objectives, personal circumstances, or needs change.

You shall not have the ability to impose restrictions on the management of your account.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. You are responsible for any taxable events in these instances. Certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is not indicative of future results.

We manage assets on a discretionary basis, which means you have given us the authority to determine the following without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account

Trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position. Additionally, your account will be rebalanced or reallocated periodically in order to reestablish the targeted percentages of your initial asset allocation. This rebalancing or reallocation will occur on the schedule we have determined together. You will be responsible for any and all tax consequences resulting from any rebalancing or reallocation of the account. We are not tax professionals and do not give tax advice. However, we will work with your tax professional to assist you with tax planning. You will have the opportunity to meet with us periodically to review the assets in your account.

We will help you open a custodial account(s). The funds in your account will generally be held in a separate account, in your name, at an independent custodian, and not with us. In order to use the Platform management services offered by AEWM, we will require that you use TD Ameritrade through the Institutional Platform or with Fidelity Institutional Wealth Services and/or its affiliate, National Financial Services LLC (Collectively "Fidelity") as the independent custodian for all accounts that we manage.

You will also receive our Advisory Agreement which describes what services you will receive and what fees you will be charged. We are available during normal business hours either by telephone, fax, email, or in person by appointment to answer your questions.

### ***Third Party Money Managers***

We may determine that opening an account with a professional third-party money manager is in your best interests. We have contracts with several third-party money managers through AE Wealth Management.

These programs allow you to obtain portfolio management services that typically require higher minimum account sizes outside of the program. The money managers selected under these programs will have discretion to determine the securities they buy and sell within the account, subject to reasonable restrictions imposed by you. Due to the nature of these programs, each of the independent money managers is obligated to provide you with a separate disclosure document. You should carefully review this document for important and specific program details, including pricing.

Under these programs, we can:

- Assist in the identification of investment objectives
- Recommend specific investment style and asset allocation strategies
- Assist in the selection of appropriate money managers and review performance and progress
- Recommend reallocation among managers or styles within the program
- Recommend the hiring and firing of money managers utilized by you.

You should read the ADV Part 2 disclosure document of the money manager you select for complete details on the charges and fees you will incur.

As an outside business activity, representatives employed by the firm will at times help facilitate life settlement transactions. These representatives will be paid a commission for these services.

### ***Fees and Compensation***

A wrap fee program allows you to pay a specified fee for portfolio management services and the execution of transactions. The fee is not based directly upon transactions in your account. The fee is bundled with our costs for executing transactions in your account(s).

The minimum account opening balance is \$250,000, which may be negotiable based upon certain circumstances and at the Adviser's discretion. Multiple accounts of immediately-related family members, at the same mailing address, may be considered one consolidated account for billing purposes. Fees are billed in arrears (at the end of the billing period) on a monthly calendar basis and calculated based on the average daily balance of the account for the current billing period. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. Under the average daily balance method, each day's balance for the month is summed then divided by the number of days in the month, to compute the average daily balance. The average daily balance is then multiplied by the monthly portion of the annual fee to determine the monthly fee due.

The Adviser will not pro rate for deposits and withdrawals in the account during the billing period. Fees will be calculated as follows:

Non-Tiered fee Schedule

Total Account Value	Fee Percent on All Assets in the Account
<b><u>Accounts with less than \$1,000,000</u></b>	<b><u>1.50%</u></b>
<b><u>Accounts between \$1,000,000 and \$1,999,999</u></b>	<b><u>1.25%</u></b>
<b><u>Accounts above \$2,000,000</u></b>	<b><u>.90</u></b>

Our Advisory Agreement defines what fees are charged and their frequency. The fees shown above are annual fees and may be negotiable based upon certain circumstances. Fees for partial periods will be charged on a pro rata basis based on the number of days remaining in the billing period. No increase in the wrap fee shall be effective without prior written notification to you. We believe our wrap fee is reasonable considering the fees charged by other investment advisers offering similar services/programs. Our fees will not be based upon a share of capital gains or capital appreciation of the funds or any portion of your funds.

If the Wrap Fee Brochure is not delivered to the Client at least 48 hours prior to entering into the management agreement, the Client may terminate the agreement for services within five business days of execution without penalty. After the five-day period, either party, upon 30 days written notice to the other, may terminate the management agreement. The management fee will be pro-rated for the month in which the cancellation notice was given and any unearned fees will be returned to the client via check.

You will authorize the custodian to directly debit fees from your account held at the custodian and to pay us. You will be provided with a quarterly statement reflecting deduction of the advisory fees.

By participating in a wrap fee program, Clients may end up paying more or less than they would through a non-wrap fee program. The relative cost of the program includes trade execution costs that would typically be passed directly through to the Client by the executing broker. Clients could invest in debt and equities directly, without the Adviser's services. In that case, Clients would not receive the services provided by the Adviser which are designed, among other things, to assist in determining which funds are appropriate for the portfolio and the Client's Account.

In our wrap fee program, we include all trade charges for your account; however, our fees do not include other related costs and expenses. You may incur certain charges imposed by custodians, and other third parties. These include custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds, money market funds and exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as "12(b)(1) fees." These 12(b)(1) fees come from fund assets,

and thus indirectly from clients' assets. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us. You should review all fees charged to fully understand the total amount of fees you will pay. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge.

Since the Adviser does not charge Clients fees based on trading activity, the Adviser may have an incentive to limit trading activities in Client account(s) because the Manager is charged for executing trades. In addition, the amount of compensation received by the Adviser may be more than what the Adviser would receive if the Client paid separately ("unbundled") for investment advice, brokerage, and other services. Therefore, the Adviser may have a financial incentive to recommend the wrap fee program over other programs or services. The Adviser monitors all Client accounts to ensure that the Adviser's fiduciary duty is met for all Clients. Any breaches of the Adviser's fiduciary duty are noted and appropriate repercussions are initiated to deter such behavior.

## **Item 5 – Account Requirements and Types of Clients**

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We require an initial minimum account size opening balance of \$250,000. The account size may be negotiable based upon the individual circumstances. Participation in the wrap fee program generally is initiated by submitting a completed account application, portfolio management agreement, and questionnaire.

The Adviser provides portfolio management services to individuals, high net worth individuals, and small business owners.

## **Item 6 – Portfolio Manager Selection and Evaluation**

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### **Portfolio Managers**

All of the Adviser's Portfolio Managers are accessed through the platform provided by AE Wealth Management. We use AE Wealth who monitors performance and trading systems. AE Wealth Management uses Orion Communities Systems which does extensive on-going review of Portfolio performance, systems, service etc. We pick portfolios based on risk levels desired for the client and our experience. If we want more aggressive options, we may choose one manager or a different one for conservative options.

We review each Model Manager before selecting them to be included in our program by reviewing information included on AE Wealth Management's Platform. We also conduct periodic reviews of the managers' performance to ensure that the selected Model Manager is suitable for your individual needs and circumstances. We also receive periodic updates regarding the managers as well as their disclosure brochures annually.

AE Wealth Management, as part of its service as the Platform provider, reviews each Portfolio Manager before selecting them to be included in their program. They also conduct periodic reviews to ensure that the manager is still suitable for the programs. AE Wealth calls these processes "due diligence." In order to

assist in conducting the due diligence and selection of both Model Managers and specific Model Portfolios, AE Wealth has contracted with an outside firm to act as their outsourced Chief Investment Officer. The Chief Investment Officer also conducts oversight of the outsourced due diligence review. Each Model Manager is evaluated on the basis of information provided by the Model Manager including descriptions of its investment process, asset allocation strategies employed, sample portfolios to review securities selections, and the Model Manager's Form ADV Disclosure Brochure (if applicable). AE Wealth often requests, but does not require, that Model Managers adhere to GIPS/CFA Institute standards, and every attempt is made to obtain performance information that is calculated on a uniform and consistent basis. Certain Model Managers may provide information that does not entirely conform to these requirements. In most cases, performance data approved for client viewing will have been calculated based on a uniform and consistent standard. In the rare instance where this is not possible, the affected performance data should clearly indicate by specific disclosure that it was not calculated based on the uniform standard. Each Model Manager recommended by AE Wealth Management is screened and selected using a number of criteria, including but not limited to:

- Manager or management team tenure and experience;
- Performance within peer group; • Portfolio turnover;
- Expenses and costs of Model Manager;
- Meetings with manager of Model Manager; and
- Participation in educational forums and conference calls offered by the Model Manager.

Factors that determine the change of a Model Manager include the following:

- Performance;
- Change of ownership;
- Strategic or tactical change away from a particular sector or asset class; and
- Costs.

AE Wealth relies on information obtained from the following sources when researching each Model Manager:

- Model Manager's Form ADV and accompanying documents;
- Model Manager's website and other publicly available information; and
- SEC website.

By choosing to utilize a Model Manager in the wrap-fee program, you are granting the platform provider with the discretionary authority (without consulting with the client first) to select the specific investments for the Account based on information, models, and/or signals provided by the selected Model Manager(s). Through its discretionary authority, Raider Dennis will have the ability to hire and fire the Model Manager and to reallocate the amount of funds within the Account that are in a particular Model Manager's model.

Neither Raider Dennis nor any of its personnel act as portfolio managers for any of the Wrap accounts offered to its clients.

## **Advisory Business**

As previously stated in Item 4 – Services, Fees and Compensation, Raider Dennis’s sole advisory service is asset management services provided through its Wrap Fee Programs. Please refer to Item 4 for all information pertaining to our advisory business. We do not tailor our services for individual client needs or allow clients to impose restrictions on investing in certain securities or types of securities. We will review your financial circumstances, investment goals and objectives, and to determine your risk tolerance and then use this information to determine which model investment portfolio is appropriate for your circumstances.

## **Performance-Based Fees and Side-by-Side Management**

The Adviser does not charge any performance-based fees. These are fees based on a share of capital gains on or capital appreciation of the assets of a Client. The Adviser does not perform side-by-side management.

## **Methods of Analysis, Investment Strategies and Risk of Loss**

### **Methods of Analysis**

We use Cyclical Analysis as part of our overall investment management discipline. Please consult the Disclosure documents provided by AEWM and the managers for more information on the methods used by the specific managers.

### **Cyclical Analysis**

While we do not attempt to time the market, we may use cyclical analysis in conjunction with other strategies to help determine if shifts are required in your investment strategies depending upon long and short-term trends in financial markets and the performance of the overall national and global economy.

### **Investment Strategies**

In order to perform this analysis, we use many resources, such as:

- Morningstar
- Financial newspapers and magazines (e.g. Wall Street Journal, Forbes, etc.)
- Annual reports, prospectuses, filings
- Company press releases and websites

The investment strategies used by the managers include, but are not limited to:

- Long term purchases -securities held at least a year
- Short term purchases - securities sold within a year
- Trading -securities sold within 30 days
- Margin Transactions

- Option writing, including covered options, uncovered options or spreading strategies.

### **Risk of Loss**

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to bear. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

### **Voting Client Securities**

As a matter of firm policy and practice, we do not have any authority to and does not vote proxies on behalf of Clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We are authorized to instruct the custodian to forward you copies of all proxies and shareholder communications relating to your account assets. Further, the Adviser will not be required to take any action or render any advice with respect to any securities held in the Account, which are named in or subject to class action lawsuits. The Adviser will, however, forward to the Client any information the Firm receives regarding class action legal matters involving any security held in the Account and discuss such information if the Client so desires.

## **Item 7 – Client Information Provided to Portfolio Managers**

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The Portfolio Managers do not have access to Client information obtained by the Adviser with respect to the particular Client accounts that they manage. The Adviser does not provide Client information to any the portfolio managers.

## **Item 8 – Client Contact with Portfolio Managers**

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The primary point of contact for Clients with respect to this wrap fee program is Peter Mendler and Stuart Raider. Clients are always free to directly contact us with any questions or concerns they have about their portfolios or other matters.

## **Item 9 – Additional Information**

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### **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 us or the integrity of our management.

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

## **Criminal or Civil Action**

Neither Raider Dennis Agency, nor any of its management persons, has had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

## **Administrative Procedure**

Neither Raider Dennis Agency, nor any of its management persons, has had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

## **Self-Regulatory Organization**

Neither Raider Dennis Agency, nor any of its management persons, has had any proceedings before any self-regulatory organizations.

## **Other Financial Industry Affiliations**

The IARs of Raider Dennis Agency have the following outside business activities and/or affiliations to disclose.

## **Registration as a Broker/Dealer or Broker/Dealer Representative**

Some of our IARs are registered representatives of Madison Avenue Securities, LLC. They can recommend securities products that will pay them a commission through their broker-dealer relationship. When such recommendations or sales are made, a conflict of interest exists as the registered representatives can receive more commissions from the sale of these products than from providing you with advisory services. Stuart Raider spends approximately 40 hours per month in this role. Peter Mendler spends approximately 40 hours per month in this role. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose to clients that they may purchase recommended products from other representatives not affiliated with us. Our Code of Ethics requires our IARs do what is in our clients' best interests at all times. Our CCO monitors all transactions to ensure that representatives put their clients first, not the commission they may receive. The broker-dealer also monitors all transaction to make certain they are suitable for the client.

## **Registration as a Futures Commission Merchant, Commodity Pool Operator or a Commodity Trading Adviser**

Neither Raider Dennis Agency nor its Advisory Representatives are registered as a Futures Commission Merchant, Commodity Pool Operator or a Commodity Trading Adviser.

## **Registration Relationships Material to This Advisory Business and Conflicts of Interest**

All of our IARs are licensed insurance agents and can recommend insurance products and also, as independent insurance agents, sell those recommended insurance products to clients. When such

recommendations or sales are made, a conflict of interest exists as the insurance licensed IARs earn insurance commissions for the sale of those products, which creates an incentive to recommend such products. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended insurance products from other insurance agents not affiliated with us.

On occasion, representatives employed by Raider Dennis Agency will help clients facilitate life settlement transactions. For this service, Raider Dennis Agency will receive compensation in the form of a commission which they will pay out to the representatives.

## **Code of Ethics, Participation or Interest in Client Accounts and Personal Trading**

### **General Information**

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. 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, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

### **Participation or Interest in Client Accounts**

We may recommend securities to you that we have purchased for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices
- Participating in client accounts

Clients and prospective clients may request a copy of the Firm's Code of Ethics by contacting the Chief Compliance Officer.

### **Personal Trading**

We may recommend securities to you that we will purchase for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. 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.

We have established the following restrictions in order to ensure our fiduciary responsibilities regarding insider trading are met:

- No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of IAR(s) of Raider Dennis, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.

Raider Dennis Agency has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of "Access Persons." The policy requires that an Access Person of the firm provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Adviser selects; provided, however that at any time that the Adviser has only one Access Person, he or she shall not be required to submit any securities report described above.

### **Conflicts of Interest**

Raider Dennis Agency representatives may employ the same strategy for personal investment account as they do for clients. However, orders will not be placed in a way to benefit from the purchase or sale of a security.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

### **Review of Accounts**

Reviews will be conducted at least annually or as agreed to by us. Reviews will be conducted by Stuart Raider, President or Peter Mendler, Vice President and CCO.

You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a mutual fund or company in which client assets are invested, and market shifts and corrections.

### **Reports**

You will be provided with account statements reflecting the transactions occurring in the account on at least a quarterly basis. These statements will be written or electronic depending upon what you selected

when you opened the account. You will be provided with paper confirmations for each securities transaction executed in the account. You are obligated to notify us of any discrepancies in the account(s) or any concerns you have about the account(s).

### **Client Referrals and Other Compensation**

We may receive economic benefit from someone who is not a client for providing investment advice or other advisory services to our clients. Raider Dennis Agency will be compensated by the third-party manager(s) from the advisory fees collected from the client. This may cause a conflict of interest in recommending certain third-party managers since we may receive compensation for referring clients to these vendors. In order to mitigate this conflict of interest, we require all IARs to inform the client that they are under no obligation to implement any recommendations made by us or the third-party manager.

### **Financial Information**

We do not solicit fees of more than \$500, per client, six months or more in advance. We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings.

## **Item 10 – Requirements for State Registered Advisers**

### **Firm Principals**

There are two principals of Raider Dennis, Stuart Raider is President and Peter Mendler is Vice President and CCO.

Neither the firm nor any of its associated persons has any relationship with any issuer of securities.

## **ADV Part 2B Brochure Supplement – Stuart E. Raider**

### **Item 1 – Cover Page**

**Stuart E. Raider**

**CRD # 1439203**

**Raider Dennis Agency, Inc.  
32770 Grand River Ave., Suite B200  
Farmington, MI 48336  
248-442-5000**

**[www.raiderdennis.com](http://www.raiderdennis.com)**

This Brochure supplement provides information about Stuart Raider and supplements the Raider Dennis Agency (“Raider Dennis”) Brochure. You should have received a copy of that Brochure. Please contact Peter Mandler if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about Stuart Raider is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Full Legal Name: Stuart Eric Raider

Year of Birth: 1959

### Education

B.S. in Finance 1982  
Michigan State University, East Lansing, Michigan

Attended for a Liberal Arts Education 1977-1978  
University of Michigan, Ann Arbor, Michigan

### Designations

CLU 1988  
American College, Bryn Mawr, PA

ChFC 1989  
American College, Bryn Mawr, PA

### Minimum Designation Requirements

#### Chartered Life Underwriter (CLU)

**Issuing Organization:** The American College

**Prerequisites/Experience Required:** 3 years of full-time business experience within the five years preceding the awarding of the designation

**Educational Requirements:** 5 core and 3 elective courses

**Examination Type:** Final proctored exam for each course

**Continuing Education/Experience Requirements:** 30 hours every 2 years

#### Chartered Financial Consultant (ChFC)

**Issuing Organization:** The American College

**Prerequisites/Experience Required:** 3 years of full-time business experience within the five years preceding the awarding of the designation

**Educational Requirements:** 6 core and 2 elective courses

**Examination Type:** Final proctored exam for each course

**Continuing Education/Experience Requirements:** 30 hours every 2 years

### Business History

September 1999 – Present	President at Raider Dennis Agency
March 2019 – Present	Registered Representative at Madison Avenue Securities, LLC
January 2004- Present	President of Raider Financial, Inc.
April 2019- April 2021	Investment Adviser Representative at AE Wealth Management, LLC
November 2014-March 2019	Investment Adviser Representative at Global Financial Private Capital
November 2014-March 2019	Registered Representative at G.F. Investment Services, LLC

August 2014 – November 2014 Investment Adviser Representative at NFP Adviser Services, LLC

November 2004 – November 2014 Registered Representative at NFP Adviser Services, LLC

### **Item 3 – Disciplinary History**

Raider Dennis Agency and its supervised persons must disclose legal or disciplinary events material to a client’s evaluation of the supervised person. Neither Raider Dennis Agency nor Stuart Raider have any disciplinary items to disclose.

### **Item 4 – Other Business Activities**

As noted in Item 9 “Other Financial Industry Activities and Affiliations” above, Stuart Raider has the following outside business activities and/or affiliations to disclose.

Stuart Raider is a registered representative of Madison Avenue Securities. He can recommend securities products that will pay them a commission through their broker-dealer relationship. When such recommendations or sales are made, a conflict of interest exists as the registered representatives can receive more commissions from the sale of these products than from providing you with advisory services. Stuart Raider spends approximately 40 hours per month in this role. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose to clients that they may purchase recommended products from other representatives not affiliated with us. Our Code of Ethics requires our IARs do what is in the client’s best interests at all times. Our CCO monitors all transactions to ensure that representatives put their clients first, not the commission they receive. The broker-dealer also monitors all transaction to make certain they are suitable for the client.

Stuart Raider does recommend insurance products and also, as an independent insurance agent, sell those recommended insurance products to clients. Stuart Raider spends approximately 40 hours per month in this role. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed IARs earn insurance commissions for the sale of those products, which creates an incentive to recommend such products. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended insurance products from other insurance agents not affiliated with us.

### **Item 5 – Additional Compensation**

Stuart Raider will receive additional compensation for sales of securities products.

While Stuart Raider endeavors at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving additional compensation creates a conflict of interest and may affect his judgment when making recommendations. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended securities from other registered representatives not affiliated with us.

Stuart Raider will receive additional compensation for sales of insurance products. Stuart Raider is eligible to receive incentive awards (including prizes such as trips or bonuses) for recommending certain types of insurance policies or other investment products that he recommends.

While Stuart Raider endeavors at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest and may affect his judgment

when making recommendations. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended insurance products from other insurance agents not affiliated with us.

### **Item 6 – Supervision**

Peter Mendler is the Chief Compliance Officer and performs all supervisory duties for his firm.

### **Item 7 – Requirements for State-Registered Advisers**

Stuart Raider has no reportable events to disclose here. Stuart Raider has never been the subject of a bankruptcy petition.

## **ADV Part 2B Brochure Supplement – Peter M. Mendler**

### **Item 1 – Cover Page**

**Peter M. Mendler**

**CRD # 1505231**

**Raider Dennis Agency, Inc.  
32770 Grand River Ave., Suite B200  
Farmington, MI 48336  
248-442-5000  
[www.raiderdennis.com](http://www.raiderdennis.com)**

This Brochure supplement provides information about Peter Mendler and supplements the Raider Dennis Agency (“Raider Dennis”) Brochure. You should have received a copy of that Brochure. Please contact Stuart Raider if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about Peter Mendler is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Full Legal Name: Peter Martin Mendler Year of Birth: 1957

### Education

Juris Doctorate 1985  
Wayne State University, Detroit, Michigan

BBA in Accounting 1979  
Wayne State University, Detroit, Michigan

### Designations

CPA (Non-practicing) 1980 Michigan

### Minimum Designation Requirements

#### Certified Public Accountant (CPA)

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 have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

### Business History

September 1999 – Present	Vice President of Raider Dennis Agency
March 2019 – Present	Registered Representative at Madison Avenue Securities, LLC
April 2019- April 2021	Investment Adviser Representative at AE Wealth Management
November 2014-March 2019	Investment Adviser Representative at Global Financial Private Capital
November 2014-March 2019	Registered Representative at G.F. Investment Services, LLC
September 2014 – November 2014	Investment Adviser Representative at NFP Adviser Services, LLC
November 2004 –November 2014	Registered Representative at NFP Adviser Services, LLC

## Item 3 – Disciplinary History

Neither Raider Dennis Agency nor Peter Mendler have any disciplinary items to disclose.

## **Item 4 – Other Business Activities**

Peter Mendler is a registered representative of Madison Avenue Securities. He can recommend securities products that will pay him a commission through his broker-dealer relationship. When such recommendations or sales are made, a conflict of interest exists as the registered representatives can receive more commissions from the sale of these products than from providing you with advisory services. Peter Mendler spends approximately 40 hours per month in this role. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose to clients that they may purchase recommended products from other representatives not affiliated with us. Our Code of Ethics requires our IARs do what is in the client's best interests at all times. Our CCO monitors all transactions to ensure that representatives put their clients first, not the commission they receive. The broker-dealer also monitors all transaction to make certain they are suitable for the client.

Peter Mendler recommends insurance products and will also, as an independent insurance agent, sell those recommended insurance products to clients. He spends approximately 40 hours per month in this role. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed IARs earn insurance commissions for the sale of those products, which creates an incentive to recommend such products. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended insurance products from other insurance agents not affiliated with us.

## **Item 5 – Additional Compensation**

Peter Mendler will receive additional compensation for sales of securities products.

While Peter Mendler endeavors at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving additional compensation creates a conflict of interest and may affect his judgment when making recommendations. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended securities from other registered representatives not affiliated with us.

Peter Mendler will receive additional compensation for sales of insurance products. Peter Mendler is eligible to receive incentive awards (including prizes such as trips or bonuses) for recommending certain types of insurance policies or other investment products that he recommends.

While Peter Mendler endeavors at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest and can affect his judgment when making recommendations. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended insurance products from other insurance agents not affiliated with us.

## **Item 6 – Supervision**

Peter Mendler is the Chief Compliance Officer and performs all supervisory duties for his firm. Please contact him at 248-442-5000 with questions regarding supervision.

## **Item 7 – Requirements for State-Registered Advisers**

Peter Mendler has no reportable events to disclose here. Peter Mendler has never been the subject of a bankruptcy petition.