



**Hamilton Poynor
CRD# 2318633**

**Arete Wealth Advisors, LLC
2318 2nd Avenue North
Birmingham, Alabama 35203
205-874-9299**

November 18, 2020

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Hamilton Poynor that supplements the Arete Wealth Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Mr.Poynor at the telephone number above if you did not receive Arete Wealth Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about Hamilton Poynor is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Form ADV Part 2B, Item 2

Hamilton Poynor

Year of Birth: 1965

Formal Education after High School:

- Auburn University, Bachelors of Science – Economics, 1987

Business Background for the Previous Five Years:

- Arete Wealth Management LLC; Registered Representative; 11/2018 to Present
- Arete Wealth Advisors, LLC; Investment Advisor Representative; 11/2018 to Present
- LPL Financial LLC; Registered Representative & Investment Advisor Representative; 07/2011 to 11/2018

Certifications:

- General Securities Representative - (Series 7)
- General Securities Principal - (Series 24)
- Uniform Combined State Law Examination - (Series 66)

Disciplinary Information

Form ADV Part 2B, Item 3

If there are legal or disciplinary events material to your evaluation of Hamilton Poynor, we are required to disclose all material facts regarding those events.¹

Mr. Poynor has no reportable disclosures. Any information responsive to this section can be obtained online on the IAPD website at www.adviserinfo.sec.gov. Go to the Investment Adviser Search page, select the Investment Adviser Representative (IAR) radio button, type in either the individual name or CRD#, and complete the authentication page.

¹ **Note:** Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving Hamilton Poynor to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of Hamilton Poynor to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.

Other Business Activities

Form ADV Part 2B, Item 4

- A. *If Hamilton Poynor is actively engaged in any investment-related business or occupation, including if Hamilton Poynor is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO or CTA, we are required to disclose this fact and describe the business relationship, if any, between the advisory business and the other business*
1. *If a relationship between the advisory business and Hamilton Poynor's other financial industry activities creates a material conflict of interest with you, the SEC requires us to describe the nature of the conflict and generally how we address it.*

We have nothing to disclose in this regard.

2. *If Hamilton Poynor receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service ("trail") fees from the sale of mutual funds, we have to disclose this fact. If this compensation is not cash, we are required to explain what type of compensation Hamilton Poynor receives. We must explain that this practice gives Hamilton Poynor an incentive to recommend investment products based on the compensation received, rather than your needs.*

Mr. Poynor is a registered representative of Arete Wealth Management, LLC. He may offer securities and receive normal and customary commissions as a result of securities transactions. This presents a conflict of interest to the extent that Mr. Poynor recommends that a client invest in a security which results in a commission being paid to him.

A conflict of interest may arise as these commissionable securities sales may create an incentive to recommend products based on the compensation of the adviser and/or our supervised person may earn and may not necessarily be in the best interests of the client.

- B. *If Hamilton Poynor is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of Hamilton Poynor's income or involve a substantial amount of Hamilton Poynor's time, we are required to disclose this fact and must describe the nature of that business. If the other business activities represent less than 10 percent of Hamilton Poynor's time and income, we may presume that they are not substantial.*

As a licensed insurance agent, Mr. Poynor may recommend to advisory clients a variety of insurance products, and may offer commissionable products to our firm's clients for which he may receive compensation. Advisory clients are never under any obligation to purchase insurance products.

Additional Compensation

Form ADV Part 2B, Item 5

If someone who is not a client provides an economic benefit to Hamilton Poynor for providing advisory services, we are required to generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include Hamilton Poynor's regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

Mr. Poynor does not receive any additional compensation for providing advisory services beyond the fees he receives through Arete Wealth Advisors, LLC. Please refer to the "Fees and Compensation", "Client Referrals and Other Compensation" and "Other Financial Industry Activities and Affiliations" sections of our firm's brochure (Form ADV Part 2A).

Supervision

Form ADV Part 2B, Item 6

Mr. Poynor is supervised by Unbo (Bob) Chung, Chief Compliance Officer of Arete Wealth Advisors, LLC.

Arete Wealth Advisors has implemented written supervisory procedures that are reasonably designed to detect and prevent violations of the securities laws, rules and regulations. You may contact Mr. Chung directly at (312) 940-3684 with any questions you may have.