
Form ADV Part 2A

LIMITLESS CAPITAL MANAGEMENT, INC

LIMITLESS CAPITAL MANAGEMENT, INC.

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FIRM BROCHURE
January 04, 2022
Part 2 of Form ADV

This brochure provides information about the qualifications and business practices of Limitless Capital Management, Inc. CRD# 158646. If you have any questions about the contents of this brochure, please contact us at 678-892-6600 and/or at www.limitlesscapitalmgmt.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 Limitless Capital Management, Inc. Also is available on the SEC's website at www.sec.gov or NASAA website at www.nasaa.org.

MATERIAL CHANGES

Limitless Capital Management, Inc. is only discussing material changes from its last annual update, January 4, 2022

- ITEM 1: AUM Updated

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Brochure Supplement(s)

ADVISORY BUSINESS

Limitless Capital Management, Inc. (or “LCM,” “we,” “our”) is an Investment Advisory, which was started this past June 2011. The principal owner of LCM is Marcus A. Turner. As of January 04, 2022, LCM has 17,350,000.00 of assets under management on a discretionary basis.

We generally provide services along three service lines: Investment management, general portfolio analysis, restructuring, creation and asset allocation. When providing investment advisory services we consider your personal situation, income needs, time horizon, liquidity needs, legal and tax constraints, risk tolerance, inter-generational issues, and special needs. Investment advisory services may include some or all of the following:

- Evaluation of your current portfolio, investment strategy, and risk tolerance.
- Education on investments, creation of investment portfolios, and how you create an investment plan to meet specific financial goals.
- Help with the drafting of your Investment Policy Statement (the policies and guidelines that govern the management of your portfolio) which you would review and approve.
- Development of asset allocation models (your overall investment mix) to provide guidance in the selection of asset classes (described below in Item 8) that are consistent with your stated investment objectives, risk tolerance, and overall financial goals.
- Rebalancing your assets among the funds and other investments, or recommendations regarding rebalancing, in keeping with your investment policy statement and chosen asset allocation.

We offer complete wealth management services to high net-worth individuals, trusts, estates, private foundations, and business entities. In order to perform our services well, we meet with our clients and work with them to outline their financial circumstances and investment objectives. We then offer an investment management program tailored to their needs. Once a client chooses an overall investment mix (referred to as an “asset allocation”), we select the specific securities to fulfill the desired mix of assets. We will also provide advice on matters that may not pertain to investments when overseeing the complex financial lives of families with substantial assets including educating multi-generations within families about living with their wealth. We may make recommendations with respect to the purchase or sale of specific securities as appropriate to address tax or estate planning objectives. For example, we may compare the consequences of selling a security in the market versus gifting a security to charity, and we may make other recommendations for tax and financial planning reasons.

Alternatively, we may analyze the purchase or sale of employer securities as part of the development of an employee client stock- option exercise program. Our recommendations are determined primarily from tax, cash flow, and estate planning considerations rather than the intrinsic merits of the specific security as an investment.

The financial planning services we offer may include assistance in defining and quantifying goals and priorities and the evaluation of needs with respect to income tax and cash flow planning, retirement planning, education funding alternatives, risk management, and compensation planning. In this regard, we may prepare financial plans and analyses as well as financial statements reflecting net worth, cash flow, and income tax projections.

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FEES AND COMPENSATION

We charge fees based on a standard fee schedule, as described below, that we believe to be market-based and competitive, however, where appropriate, fees are subject to negotiation.

The way we charge investment management fees is established in your written agreement with us. We bill our investment management fees quarterly, in arrears. Investment management fees are calculated using the agreed-upon fee schedule applied to the value of the managed portfolio on the last day of the calendar quarter. Clients authorize us to directly debit the fees from specific client accounts designated by them. Fees are prorated for the first quarter in which you engage us based on the number of days from the effective date of the engagement agreement to the last day of the calendar quarter. If you terminate your engagement agreement during a calendar quarter, you will be charged a prorated fee, which is due and payable on the day the agreement terminates. In the event that you have prepaid fees, upon termination any prepaid, unearned fees will be promptly refunded.

We do not receive any fees or compensation related to the sale or purchase of securities or other investment products. Neither I nor any of our employees or principals receives any commissions from sponsors of investments products.

We charge fees based on a standard fee schedule, ranging from 2% to 0.5% of the value of your portfolio, per annum. We believe our fees to be market-based and competitive; however, all fees are subject to negotiation.

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses charged by others and which are paid by you. You may incur certain charges imposed by custodians, brokers, third party investments and other third party activities such as fees charged by managers or custodians, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in each fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to our fees, and we shall not receive any portion of these commissions, fees, and costs.

PERFORMANCE BASED FEES & SIDE-BY-SIDE MANAGEMENT

LCM does not charge or accept performance-based fees nor does it manage both accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as hourly, flat rate or asset-based fee.

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Types of Clients

We provide investment advisory and financial planning services primarily to individuals, including corporate executives, business owners, affluent individuals. We also provide investment management services to trusts. Account minimum requirements vary from \$5,000.00 to \$250,000.00 depending on the money management strategy selected for the client. Accounts with less than \$5,000.00 in client assets may be accepted on an individual basis.

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Methods of Analysis, Investment Strategies and Risk of Loss

When we begin our work together, we will first quantify your financial goals to ensure we have a mutual understanding of what you want to accomplish with your investments. We then suggest an investment strategy, personalized to your needs and your ability to endure market changes.

We generally divide our investment program into five steps:

1. Analyzing an individual's financial circumstances;
2. Developing an appropriate Investment Policy Statement (investment objectives, risk tolerances, & other client-specific information);
3. Allocation across asset classes (e.g., stocks, bonds, domestic, overseas, large companies, small companies, real estate, commodities);
4. If a portfolio is already in place, we analyze the current portfolio and have conversations with the client with necessary adjustments/ changes.
5. Portfolio monitoring/rebalancing & performance evaluation.

The investment advice given to you is based on a number of factors, including our investment objectives and financial goals, risk tolerance, asset class choices, investment time horizon, cash needs, taxes, historical returns, expected returns, and general economic conditions. We use various types of reviews pertaining to capital markets, investment strategies, and individual investments when providing investment advice. Those reviews usually include historic, current, and anticipated: economic, sector (e.g., energy or technology), industry, company, financial market and investment return information. Regardless of the methods we use in providing investment advice, investing in securities involves risk of loss that you should be prepared to bear.

Our approach for generating asset allocation recommendations is based on extensive capital market research and may also involve the use of third-party experts and consultants. Nevertheless, perhaps the largest material risk for clients would be forecasting errors in our expectations for long-term capital market performance. In the event our expectations are significantly different than actual long-term experiences, you could be substantially disadvantaged as these estimates help to guide our portfolio construction recommendations and financial planning efforts.

The investments we recommend are generally third party advisors, generally exchange traded funds, we may at some point recommend mutual funds, hedge funds, and other private investment partnerships. We may also recommend investing in certain individual securities.

Investments are made across a wide range of markets and strategies. You should carefully read the prospectus, statement of additional information and periodic shareholder reports for further detail on specific risks associated with investing in any of these securities.

Some investment partnerships may be exempt from federal securities and/or investment company registration and as a result may only be available to qualified purchasers and/or accredited investors, depending on the unregistered partnership/fund. You should carefully read the private offering memorandums to fully understand the associated risks of these investments, and should consider seeking the advice of a lawyer. Risks may include, but are not limited to: higher costs/taxes; less transparency (details about the investment partnership may be limited), less liquidity (limitations on redeeming the investment for cash), security valuation/pricing risk (illiquid investments often involve judgment when the managers value them), and in general such investments may be more difficult to understand and benchmark.

We periodically rebalance client portfolios because studies show that this increases returns and/or lowers risk over the long-term. Rebalancing involves trading securities – buying some and selling others - in order to bring your portfolio back to your original asset mix. This is necessary because, over time, the distribution of your portfolio may become out of alignment with your investment goals. And, in the near term, you'll find that some of your investments will grow or decline faster than others. You may experience some additional transaction costs due to this rebalancing. You also may suffer some lower returns if the assets sold have higher returns in the future than the one's being purchased.

We utilize economic, financial and market data from third-party sources we believe to be reliable but we generally do not seek to independently confirm the accuracy of such information. Similarly, we rely on a variety of third-party financial applications to perform numerous financial calculations related to asset allocation, financial planning projections, and investment manager evaluations. Although we review the quality of these services there can be no guarantee the calculations will be performed correctly going forward.

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DISCIPLINARY INFORMATION

Limitless Capital Management and/or Marcus A. Turner, currently does not have any disciplinary information and/ or infractions.

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OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

Marcus Richmond Partners, LLC DBA Limitless Capital Markets and Cogito Capital Group, LLC are insurance brokerages majority owned by Marcus Turner. Marcus Turner is licensed in certain states as an insurance agent with appointments to act as an agent for various insurance companies. Marcus Turner is license in Georgia. As such, he may offer insurance products to clients and receive normal and customary commissions as a result of such a purchase. This presents a conflict of interest to the extent that he recommends the purchase of insurance products that result in commissions being paid to him as an insurance agent. This conflict of interest is disclosed to the client and commissions received do not exceed the normal and customary commissions paid by any such insurance company.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING CODE OF ETHICS

We have adopted a Code of Ethics for all employees of the firm describing our high standard of business conduct, and fiduciary duty to our clients. The Code of Ethics includes provisions relating to the confidentiality of client information, prohibition of insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All of our employees must acknowledge the terms of the Code of Ethics (COE) annually, or as amended.

Our COE requires, among other things, that employees:

- Act with integrity, competence, diligence, respect, and in an ethical manner with the public, clients, prospective clients, employers, employees, colleagues in the investment profession, and other participants in the global capital markets;
- Place the integrity of the investment profession, the interests of clients, and the interests of the firm above one's own personal interests;
- Adhere to the fundamental standard that you should not take inappropriate advantage of your position;
- Avoid any actual or potential conflicts of interest;
- Conduct all personal securities transactions in a manner consistent with this policy;
- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities;
- Practice and encourage others to practice in a professional and ethical manner that will reflect credit on oneself and the profession;
- Promote the integrity of, and uphold the rules governing, capital markets;
- Maintain and improve one's professional competence and strive to maintain and improve the competence of other investment professionals.
- Comply with applicable provisions of the federal securities laws.

Our COE also requires employees to:

- 1) Pre-clear certain personal securities transactions,
- 2) Report personal securities transactions on at least a quarterly basis, and
- 3) Provide the firm with a detailed summary of certain holdings and securities accounts (both initially upon commencement of employment and annually thereafter) over which such employees have a direct or indirect beneficial interest.

A complete copy of our COE is available to any client or prospective client upon request.

Our employees and persons associated with us are required to follow our Code of Ethics. Subject to satisfying this policy and applicable laws, our Principals and employees may trade for their own accounts in securities which are recommended to and/or purchased for our clients. The COE is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the COE certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of our clients. In addition, the COE requires pre-clearance of many transactions, and restricts trading ahead of client trading activity. Nonetheless, because the COE permits employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is regularly monitored under the COE, to reasonably prevent conflicts of interest between LCM and our clients.

It is our policy that the firm will not do any “agency cross securities transactions” (defined below) for client accounts. We will on rare occasion do “principal transactions” or “cross trades” (defined below) between client accounts, such as when an individual client contributes an interest in an investment to one of the private partnerships to which we are the investment adviser. In this circumstance, the client receives an interest in the private partnership equal to the fair value of the contributed investment. We will not do cross trades of publicly traded securities between client accounts. “Principal transactions” are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. An “agency cross transaction” is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

In the normal course of business, LCM and its Principal, manager and employees may provide gifts and gratuities to various individuals or entities such as clients, vendors, consultants, and service providers. These gifts, gratuities and contributions are not premised upon any specific client referrals or any expectation of any other type of benefit to LCM. Except, in situation of Solicitors who may be compensated for referring clients. All compensation must be disclosed to the client in advance of becoming a client of LCM. LCM has adopted detailed procedures requiring pre-approval and record-keeping of gifts and gratuities.

BROKERAGE PRACTICES

Consistent with our fiduciary obligations, Limitless Capital Management, Inc. seeks best execution in all transactions. We define best execution as the best price we believe we may obtain for a specific trade in light of all relevant circumstances. This Trading and Brokerage Policy is designed to assist the firm in meeting its goal of seeking best execution in all transactions. However, as a single written policy describing the firm's trading and brokerage practices cannot alone ensure best execution, Limitless Capital Management, Inc. employees are expected to be mindful of their responsibility to seek best execution for our clients as part of their daily business activities, and are encouraged to suggest any recommendations to firm management which may improve upon our best execution process. The CCO will formally review trading and brokerage practices no less frequently than on an annual basis. A primary reason for this review is to improve upon our best execution process.

How We Select Brokers/Custodians

The Principal is responsible for identifying and approving custodians to use for custody and executing trades for client accounts. The Principal considers various factors in selecting a broker, including:

- Financial condition;
- Acceptable record keeping;
- Ability to obtain best price;
- Knowledge of market, securities and industries;
- Commission structure; and
- Reputation and integrity.

Limitless Capital Management Inc. uses TD Ameritrade Institutional Services, and Lincoln Financial for trading and custody of all clients' accounts. TD Ameritrade Institutional Services provides dedicated account representatives who provide exceptional client services, provides good trading executions, has an efficient and non-error prone platform.

The official records for all holdings and transactions are provided by the account custodian; proper completion of all TD Ameritrade forms is a responsibility between TD Ameritrade and their clients (which are also LCM's clients). Limitless Capital Management, Inc. is not a TD Ameritrade employee or representative, but an Independent state Registered Investment Advisory.

Trade Aggregation and Allocation

Limitless Capital Management, Inc. strives to treat all clients in a fair manner. This is the basic principal underlying this aggregation and allocation policy. The allocations of a particular security will be determined by Limitless Capital Management, Inc. before the trade is placed with the broker. When practical, client trades in the same security will be bunched in a single order (a “block”) in an effort to obtain best execution at the best security price available. When employing a block trade:

- We will attempt to fill client orders by day-end;
- If the block order is not filled by day-end, the Principal will allocate shares executed to underlying accounts on a pro rata basis, adjusted as necessary to keep client transaction costs to a minimum and in accordance with specific account guidelines;
- If a block order is filled (full or partial fill) at several prices through multiple trades an average price and commission will be used for all trades executed;
- All participants receiving securities from the block trade will receive the average price; and
- Only trades executed within the block on the single day may be combined for purposes of calculating the average price.

It is expected that this trade aggregation and allocation policy will be applied consistently. However, if application of this policy results in unfair or inequitable treatment to some or all of Limitless Capital Management Inc.’s clients, we may deviate from this policy.

Trade Error Correction

It is Limitless Capital Management Inc.’s policy to ensure clients are made whole following a trade error. Specifically, when Limitless Capital Management Inc.’s causes trade error to occur in a client account that results in a loss, Limitless Capital Management, Inc. will reimburse the client. If the trade error results in a gain, Limitless Capital Management, Inc. will keep that gain.

Use of Custodian Research

Limitless Capital Management, Inc. periodically uses research information provided by broker-dealers with whom we conduct business. However, Limitless Capital Management, Inc. does not have any formal or informal agreements to compensate custodian for the receipt of such research information. Limitless Capital Management, Inc., as a matter of practice, does not compensate custodian for third-party research services (known as “soft dollar arrangements”) with the use of client commissions – any payment required for such research will be made in cash. Questions regarding this policy should be directed to the CCO.

Portfolio Valuation Policy

Limitless Capital Management, Inc. will use information provided by the client's custodian as our main pricing source for purposes of valuing client portfolios, both for fee billing and investment performance calculation purposes.

Fair Valuation Policy

In the rare instance where the custodian is unable to obtain a price, where Limitless Capital Management, Inc. strongly believes the custodian is not pricing a security fairly or where a security has halted trading, the Principal will determine a fair value for that security. When determining a fair value for a security, the Principal will attempt to obtain a quote from at least one independent pricing source, preferably two or more. The principal will make a determination as to whether these quotes represent fair value. If the principal is unable to obtain quotes or determine the quotes received do not represent fair value, s/he will establish a fair valued price for the security based on his/her knowledge of the security and current market conditions, among any other considerations deemed appropriate. The principal will also document the rationale used to establish a fair valued price for the security. Fair valued securities will be reviewed by the principal regularly, but no less frequently than at year-end. The fair valued price will be adjusted as appropriate by the principal or priced by the custodian as soon as the price is available and deemed to be reliable. A list of fair valued securities and the rationale supporting the fair valuation will be maintained by the principal.

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REVIEW OF ACCOUNTS

Limitless Capital Management, Inc. reviews accounts on at least a semi-annual basis by comparison of books and records to statements. They may also be reviewed at the discretion of the CCO or Principal, by client or advisor request or as a result of a triggering event described below. Performance reports, may be provided by the custodian; to the clients on a monthly or quarterly basis, in the form of statements. Client account triggers are in four general categories: Written customer complaint, internal office (staff or another advisor) complaint, a pattern of non-compliance or suitability as determined by the CCO, Principal, and/or supervising Principal, and significant value fluctuations in the overall portfolio. We do not provide regular client account reports; those come either monthly or quarterly from the custodian in the mail or online.

CLIENT REFERRALS AND OTHER COMPENSATION

Item 14

We do not accept any economic benefit from anyone other than the client for providing investment advice or other advisory services to our clients. We do directly or indirectly compensate any person who is under a Solicitor agreement with LCM for client referrals. Solicitors are required to disclose the nature of his/her relationship with Limitless Capital Management, Inc. at the time of the solicitation. For example, the affiliated solicitor may provide a Limitless Capital Management, Inc. business card to the prospective client. Affiliated solicitors are required to disclose the specific terms of the solicitation arrangement with Limitless Capital Management, Inc., including the level of compensation the affiliated solicitor is to receive from Limitless Capital Management, Inc., for a client referral.

Item 15

CUSTODY OF CLIENT FUNDS

While we do not have full custody of client funds, clients should understand that LCM has limited custody only as far as deducted fees directly from a client account on a quarterly basis (See Item 5). TD Ameritrade and Lincoln Financial the qualified custodian sends quarterly or more frequently account statements directly to the client. Clients should carefully review those statements. We do not send account statements to clients.

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INVESTMENT DISCRETION

We accept discretionary authority to manage securities accounts on behalf of our clients. The Investment Advisory Agreement signed by the client gives us the sole discretion to manage the client's account in conformance with the risk tolerance level selected by the client. The client may specify investment restrictions with regard to legal social or tax considerations on the Confidential Client Profile, which is a part of the Investment Advisory Agreement.

Discretionary Investment Management

We prefer to receive discretionary authority from our clients at the outset of an advisory relationship. This authority makes us responsible for selecting the identity and amount of securities to be bought or sold in your accounts. In all cases, however, such discretion is exercised in a manner consistent with your stated investment objectives as outlined in your investment policy statement or in line with your investment goals and risk tolerance level. You will need to execute a limited power of attorney to permit us to trade in your accounts.

When selecting securities and determining amounts to buy or sell, we observe the investment policies, limitations and restrictions that you and we have discussed and agreed upon. We document those policies and investment guidelines in an investment policy statement for you to review and agree to, and which we both sign.

It is your responsibility to promptly notify us if there is ever any change in your financial situation or investment objectives. It is necessary that you keep us promptly informed about changes in your financial circumstances for the purpose of reviewing, evaluating, and/or revising our previous recommendations to you.

Because we manage more than one account and have many clients with varying circumstances, there may be conflicts of interest over time devoted to managing any one account and allocating investment opportunities among all the accounts we manage. For example, we may select investments for a particular client based solely on the investment strategy being pursued for that client. Different clients may have differing investment strategies and expected levels of trading. We may buy or sell a security for you but not for another client, or may buy (or sell) a security for one type of client while simultaneously selling (or buying) the same security for another type of client. We attempt to resolve all such conflicts in a manner that is generally fair to all of our clients. We may give advice to, and take action on behalf of, any of our clients that differs from the advice given to another client so long as it is our policy, to the extent practicable, to allocate investment opportunities to our clients fairly and equitably over time. We are not obligated to acquire for any account any security that we, our principals, or our employees may acquire for their own accounts or for any other client, if in our absolute discretion, it is not practical or desirable to acquire a position in such security for that account.

VOTING CLIENT SECURITIES

Our Policy and Procedures Manual allows LCM to vote on client securities if permitting by the individual client. Clients cannot direct us to vote in a particular solicitation. Clients may obtain a copy of our proxy voting policy upon request. Clients will receive a copy of their proxy or other solicitations directly from their custodian or a transfer agent. LCM personnel may answer client questions regarding proxy-voting matters in an effort to assist the client in determining how to vote the proxy.

FINANCIAL INFORMATION

As stated above, we have discretionary authority over individual, business and IRA client accounts. We are unaware of any financial condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

Part 2B of Form ADV
FIRM BROCHURE SUPPLEMENT

January 04, 2022

Marcus Turner

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This Brochure Supplement provides information about Marcus A. Turner that supplements the Limitless Capital Management's Brochure. You should have received a copy of that Brochure. Please contact compliance@limitlesscapitalmgmt.com if you did not receive Limitless Capital Management's Brochure or if you have any questions about the contents of this supplement. Additional information about Marcus A. Turner CRD# 5966164 is available on the SEC's website at <http://www.adviserinfo.sec.gov/>

Item 2

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

EDUCATION AND EMPLOYMENT FOR:

Marcus Turner, Chairman, CEO Date of Birth: April 05, 1971 Education Bachelor of Science – Business Management – Providence College 1993 Bachelor of Science - Employment: Bankers Life/ Manager 2008-2009, Cogito Capital Group - Chairman/CEO 2009 – Present Marcus Richmond Partners- Chairman/CEO 2010 - Present Limitless Capital Management - Chairman/CEO 2011- Present

Item 3

DISCIPLINARY INFORMATION

Limitless Capital Management and/or Marcus A. Turner, currently does not have any disciplinary information and/ or infractions in the securities, Advisory or Insurance fields.

Item 4

OTHER BUSINESS ACTIVITIES

The following advisor is actively engaged as a licensed insurance agent facilitated through insurance brokerage Cogito Capital Group, LLC and commercial lending brokerage Marcus Richmond Partners, LLC DBA Limitless Capital Markets. The persons receive commissions based on the sale of insurance and commercial lending products in the following states: Georgia. This practice gives your advisor an incentive to recommend insurance products based on the compensation received, rather than on client need. We fully disclose, in this document and in the documents that clients sign to transact business with us, all conflicts of interest related to the purchase and sale of securities and insurance products. All transactions of this nature all fully reviewed by supervisory personnel to make sure that the client’s needs come first and are being met so that we carry out fully our fiduciary duty to the client. This includes making sure the conflict of interest that arise are fully disclosed and that the transactions are suitable for the client.

	<u>INSURANCE AGENT</u>	<u>STATES LICENSED GA.</u>
Marcus Turner	Yes	Yes

ADDITIONAL COMPENSATION

LCM does not allow someone who is not a client to provide an economic benefit to any of investment adviser representative for providing advisory services. We also do not pay bonuses to advisors based in whole or in part on the number or amount of sales, client referrals or new accounts.

SUPERVISION

All paperwork executed by the client for investment purposes. Is generally approved by the Principal of LCM. In this manner, we are able to review client advisory business that is submitted, as the paperwork is reflective of the investment advice given to the client. In the event that paperwork is rejected for any reason, the advisor is notified in writing by the Principal; of the problem or deficiency so that it may be corrected appropriately.

The Principal with initial supervisory responsibility over the advisors is Marcus Turner, 3060 Peachtree Road NW, Suite 1210, Atlanta Georgia 30305, 678-892-6600