



**PART 2B OF FORM ADV:  
BROCHURE SUPPLEMENT**

**Jonathan G. Neher**

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**SUPERVISION**

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This Brochure Supplement provides information about Jonathan G. Neher that is an accompaniment to the Disclosure Brochure for our firm, Cambridge Investment Research Advisors, Inc (CIRA). You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you have questions about this Brochure Supplement for Jonathan G. Neher, you are welcome to contact us through the information listed to the left.

Additional information about Jonathan G. Neher is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Please be aware that not all states require registration and therefore your Advisor may not show up on the SEC website.

**Jonathan G. Neher**

CRD#: 2962974  
Year of Birth: 1975

**EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

Education

None

Business Background

IA Rep, Cambridge Investment Research Advisors, Inc,  
December 2008 To Present

Reg Rep, Cambridge Investment Research, Inc,  
December 2008 To Present

## **DISCIPLINARY INFORMATION**

Jonathan G. Neher has no legal or disciplinary events to report.

## **OTHER BUSINESS ACTIVITIES**

In addition to serving as your investment advisory representative Jonathan G. Neher is engaged in the following business activities:

Insurance Agent/Sales - Mountain Lake Financial, LLC

There are certain business activities in which an investment advisor representative may engage that present potential conflicts of interest. If applicable, additional disclosure relevant to your Advisor's outside business activities are outlined below. Please note that these are potential conflicts of interest and it is your Advisor's fiduciary duty to act in your best interest. If you have any questions about the disclosures please ask your Advisor as this is an opportunity to better understand your relationship and your Advisor's activities.

Your advisor is also a registered representative with Cambridge Investment Research, Inc., ("Cambridge") a registered securities broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC). When acting as a registered representative of Cambridge, your advisor may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. Clients are not obliged to purchase or sell securities through Cambridge or their Advisor. However, if you choose to establish an account with your Advisor, it is important to understand that due to regulatory constraints, your Advisor must place all purchases and sales of securities products in commission-based accounts through Cambridge or other institutions approved by Cambridge.

The receipt of commissions may create an incentive for your Advisor to recommend those products for which they will receive a commission. Consequently, the objectivity of the advice rendered to clients could be biased. Your Advisor controls for this potential conflict of interest by discussing with clients their specific needs, the benefits and negatives of establishing a fee-based account through CIRA versus establishing a commission-based account through Cambridge Investment Research, Inc. and also the compensation arrangements under the different scenarios.

Your Advisor may receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. 12b-1 fees are considered distribution or marketing fees and come from fund assets and indirectly from client assets through fund expenses. There are numerous reasons why your Advisor may recommend a certain mutual fund but it is possible the receipt of such fees represents an incentive for your Advisor to recommend funds with 12b-1 fees over funds that have no fees or lower fees. 12b-1 fees can be earned in fee-based accounts managed by CIRA if 12b-1 fee paying mutual funds are held in the managed account. In such a situation, your Advisor will discuss the selection of a 12b-1 or other trail paying mutual funds. When managing ERISA and qualified accounts, 12b-1 (marketing and distribution) fees and trail earned will be credited to your account at the clearing firm whenever possible. When 12b-1 fees and trails are received by your Advisor in his/her capacity as Registered Representative of Cambridge, the investment advisory fee will be lowered, or offset by that amount.

Your Advisor is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, your Advisor will receive commissions for selling insurance and annuity products. Clients may choose any independent insurance agent and insurance company to purchase insurance products and are not obligated to purchase insurance products through your Advisor. Regardless of the insurance agent selected, the insurance agent or agency may receive normal commissions from the sale. The receipt of compensation and other potential incentive benefits creates an incentive to recommend products to clients. At the time of any recommendations your Advisor will discuss the products, your needs and any compensation arrangements.

## **ADDITIONAL COMPENSATION**

In addition to the description of other business activities outlined above, your Advisor may receive additional benefits from CIRA when assets are held through investment management platforms offered by CIRA, which may include CIRA's CAAP program (also described in CIRA's Disclosure Brochure). The benefits received are in addition to the advisory fees received by your Advisor for serving as the investment advisor representative to the client's account. These benefits

include but are not limited to discounts on performance reporting software and participation in conferences.

Certain product sponsors may provide your Advisor with economic benefits as a result of your Advisor's recommendation or sale of the product sponsors' investments. The economic benefits received can include but are not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist your Advisor in providing various services to clients. These economic benefits may be received directly by your Advisor or indirectly through CIRA and/or Cambridge Investment Research, Inc. who have entered into specific arrangements with product sponsors. These economic benefits could influence your advisor to recommend certain products/programs over others. Please review the CIRA and Cambridge Revenue Sharing Disclosure located at [www.cir2.com](http://www.cir2.com) for further information. It is also available upon request.

Your Advisor's investment advisory activities are supervised by John J. Fenwick. John J. Fenwick monitors the recommendations provided by your Advisor and any transactions that are executed in your advisory accounts. Supervision is conducted through electronic reporting as well as personal communications and visits with your Advisor.