

On June 1, 2026, the following changes were made to the Form CRS (Client Relationship Summary) of Rockport Wealth, LLC, doing business as Rockport Wealth Advisors:

- **Investment Authority** was updated to state: *We do not vote proxies on behalf of our clients.*
- The following was removed from **Description of Principal Fees and Costs** as it is no longer applicable: *Prior to November 1, 2025 some clients may remain in the Advisor's non-wrap program and in such cases will incur normal commission, trade execution and custodial fees.*
- The following was removed from **Description of Other Fees and Costs** as it is no longer applicable: *Investors not using our wrap program are responsible for third-party fees associated with financial and investing activities and these will vary depending upon the nature of services utilized, investments purchased and sold, and other factors. Clients may pay transaction fees and brokerage commissions to their brokerage firm(s), as well as fees associated with particular accounts (e.g., transfer fees, termination costs, wire transfer fees, retirement plan and/or trust fees, deferred sales charges, odd lot differentials, and other fees and taxes associated with investing).*

Rockport Wealth, LLC, (the “Advisor” or “we”) *doing business as*, “Rockport Wealth Advisors” is an investment advisor registered with the Securities and Exchange Commission (SEC). Investment advisory services and fees differ from those of a broker-dealer, and it is important for retail investors to understand these differences. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisors, and investing.

RELATIONSHIPS AND SERVICES

What investment services and advice can you provide me?

Description of Services: The Advisor provides fee-based investment advisory services and is a fiduciary to each client. We offer **investment management, financial planning, and consultation services**. Investment management includes financial planning and involves ongoing services. Stand-alone financial planning and consultation services terminate on delivery unless otherwise agreed. We are not a broker/dealer or custodian and are not legally affiliated with any other financial firm. [Items 4, 7, 10.C, 16 & 17, Form ADV, Part 2A Brochure](#).

Monitoring: Investment Management: We regularly monitor managed accounts for conformity with stated investment objectives and portfolio goals, and for compliance with written investment guidelines. Underlying assets are reviewed frequently (often daily). Internal portfolio reviews occur no less than annually, generally quarterly and entail analyzing securities, assessing current market conditions, analyzing investment results and other factors. The timing of reviews may also be guided by investment type, individual circumstances as reasonably known by the Advisor, market conditions, and economic events. Non-periodic reviews may be triggered by significant deposits or withdrawals, reported changes in a client’s situation, and when a client’s asset allocation deviates over targeted limits, at which time portfolio action is considered. We prefer that clients initiate meetings no less than annually and prompt clients to review their personal and financial profile data at least annually to ensure data remains current. Clients are obligated to promptly inform the Advisor of any real or potential change in their financial condition to give the Advisor the opportunity to review the new data and consult with the client to help ensure the designed strategies continue to be appropriate. The included financial planning services are client-initiated and the Adviser remains available to provide interim and annual planning reviews. **Our stand-alone financial planning and consultation services do not involve ongoing monitoring unless otherwise agreed in the client agreement**). [Item 13, ADV 2A](#) **Investment Authority:** We maintain limited discretionary trading authority if granted by the client via our management agreement and custodial account forms and will implement transactions within our client’s designated investment objectives, to include the type and amount of securities to be bought and sold. We do not vote proxies on behalf of our clients. We will not hold full power of attorney nor take custody of client funds or securities other than the ability to deduct our contractually agreed management fees via the client’s account if authorized by the client. Clients can expect to receive trade confirmations and account statements directly from their custodian. For non-discretionary services, clients make the ultimate decision regarding the purchase or sale of investments. [Items 16 and 17 Form ADV, 2A](#), **Limited Investment Offerings:** We are an independent investment advisor and do not offer proprietary products and are not limited as to types of investments. **Advice and Investments:** Recommended investments may include stocks, exchange traded funds, no load mutual funds, short-term instruments, bonds, options, inverse ETF derivatives, and other investments, as outlined in the client’s designed strategies. Recommendations associated with assets in corporate retirement plans are limited to those offered within the plan. [Item 4B, Form ADV 2A](#), **Account Minimums and Other Requirements:** The suggested account minimum for investment management services is \$250,000 but can be negotiated based upon individual circumstances. [Item 7, Form ADV 2A](#), **Additional Information: Fiduciary:** We are a fiduciary to each client. We must act in our client’s best interest and not put our interests ahead of yours. This CRS is a brief relationship summary designed to help investors make informed choices regarding what type of relationship and services best suits the investor’s particular circumstances and investment objectives. Please read our Form ADV 2A Brochure as it provides important information about our services, fees, business affiliations, and other matters.

CONVERSATION STARTERS

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including licenses, education, and other qualifications? What do these qualifications mean?

FEES, COSTS, CONFLICTS AND STANDARD OF CONDUCT

What fees will I pay?

Description of Principal Fees and Costs: Our fees may be higher or lower than may otherwise be available for similar services. Our **Investment Management** fees are calculated as a percentage of assets under management for the relationship by household and combines portfolio management, commissions, trade execution costs, custody, and other standard brokerage services within a single investment management fee under The Rockport Wealth Wrap Fee Program. Private placements recommended by the Advisor are included in our Wrap Program but private placements not recommended by the adviser are not included in our program and are excluded from billing. Client will pay all custodial fees related to these investments. Our fee is negotiable, based on the nature, complexity, and scope of services as well as the amount and nature of assets to be managed, pre-existing relationships, and other factors, at the discretion of the Advisor. [Form ADV 2A, Items 4 & 5, Appendix 1 Wrap Fee Brochure](#). As assets increase, you will pay more in management fees and thus our revenue increases. We work to mitigate this conflict by selecting investments we believe are appropriate for clients in accordance with the Advisor’s and the client’s investment strategies and we have established procedures designed and implemented to (i) ensure that all clients are treated fairly and equally, and (ii) prevent potential conflicts with respect to investment allocations among clients. [Form ADV 2A, Item 6](#) Our **financial planning and consultation** fees are hourly, or project based and agreed to at engagement based on unique circumstances, required services, scope and/or complexity of services or other factors, at The Advisor’s discretion. [Items 4, 5 & 6, ADV 2A](#).

Description of Other Fees and Costs: 1. The Rockport Wealth Wrap Fee Program combines a portfolio management fee as well as commissions, trade execution costs, custody, and other standard brokerage services within a single, bundled fee. Please read

	<p>the Adviser's ADV 2A, Appendix 1, Wrap Fee Brochure as it discusses the Program, conflicts of interest, and important considerations. The Program fee does <u>not</u> include mark-ups, and mark-downs, dealer spreads or other costs associated with the purchase or sale of securities, interest, taxes, or other costs, such as charges for transactions not executed through Charles Schwab & Co., Inc., costs associated with exchanging currencies, wire transfer fees, private placements not recommended by the Advisor, or other fees required by law or imposed by third parties). Conflict of Interest: When managing an account on a wrap fee basis, we receive as compensation for our services, the balance of the total wrap fee you pay after custodial, trading, and other management costs (including execution and transaction fees) have been deducted. We do not charge higher advisory fees based on their trading activity, but you should be aware that it creates an incentive to limit our trading in your account(s) because we are charged for executed trades. Fees and expenses charged to shareholders of exchange-traded and mutual fund shares are exclusive of and in addition to the Adviser's fees. Item 5, Form ADV 2A. Additional Information: <i>You will pay fees and costs whether you make or lose money on your investments. These fees and costs will reduce any amount of money you make on your investments over time. You should ensure that you understand what fees and costs you are paying.</i> The Advisor's fees may be higher or lower than what may be charged by other firms for similar services. You are encouraged to read Form ADV disclosures and prospectus information. Items 5 & 6, Form ADV 2A. 2. We engaged Betterment, LLC to access, among other things, Betterment's software, advice, and digital services whereby we retain our role as primary adviser. When the Betterment platform is utilized, the advisory fee is split between us and Betterment via a separate agreement with clients. Items 10.D Form ADV 2A.</p>
<p>What are your legal obligations to me when acting as my investment adviser?</p> <p>How else does your firm make money and what conflicts of interest do you have?</p>	<p>CONVERSATION STARTER</p> <ul style="list-style-type: none"> ➤ Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? <p>Standard of Conduct: We are a fiduciary to each client. <i>When we act as your investment advisor, we are required to act in your best interest and not put our interests ahead of yours.</i> At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the advice we provide. Here are some examples to help you understand what we mean: We are likely to recommend our services and during our relationship, we may recommend that you add funds to your managed portfolio. As managed assets increase, our fees increase as does the compensation to our financial professionals. While we are compensated by fees paid by our clients, our financial professionals may recommend commission-based products in their separate capacities as insurance agents and registered representatives as discussed below. Items 5.A, B & 5, Items 10.C, 10.D, 12, 13 & 14B., Form ADV, Part 2A Additional Information: All investment advisers face conflicts of interest which are inherent in the business. We have a financial incentive to recommend our services and our primary source of compensation is asset-based fees - thus we are incentivized to acquire new clients and increase managed assets. Additional conflicts arise when we recommend services and products associated with our other business activities. You are never obligated to use our services or purchase services/products associated with our outside business activities. Items 10.D & 17, ADV 2A</p> <p>CONVERSATION STARTER</p> <ul style="list-style-type: none"> ➤ How might your conflicts of interest affect me and how will you address them? <p>How do your financial professionals make money? Our financial professionals receive salary-based compensation, a percentage of advisory billings and/or bonuses based on the amount of client assets they bring to our firm. Our professionals who own the Advisor share the profits generated by our firm. Therefore, our professionals have an incentive to encourage you to increase the assets in your account and increase our firm's profitability. Outside Business Activities: Certain of our professionals are separately engaged as insurance agents. Several of our professionals are dually registered as representatives of an unaffiliated broker/dealer. This creates a conflict of interest because these persons receive commission-based compensation in connection with insurance and securities transactions, including 12b-1 fees for certain investment co. products. You are never obligated to purchase insurance or securities. Advisory fees are not reduced to offset commissions. Items 5.E, 10.C & 10.D Form ADV 2A & ADV 2B</p>
<p>DISCIPLINARY HISTORY</p>	<p>Do you or your financial professionals have legal or disciplinary histories? Yes. A free and simple search tool is available at investor.gov/CRS if you would like to search our firm, our registered personnel, or another financial service provider.</p> <p>CONVERSATION STARTERS:</p> <ul style="list-style-type: none"> ➤ As a financial professional, do you have any disciplinary history? For what type of conduct?
<p>ADDITIONAL INFORMATION</p>	<p>Information about The Advisor (CRD# 297122) and its registered personnel can be found at https://adviserinfo.sec.gov. Our website: https://www.rockportwealth.com. You may contact The Advisor at (330) 965-9890 or compliance@rockportwealth.com to inquire about services or to request our most recent Client Relationship Summary and Form ADV 2 Brochures.</p> <p>CONVERSATION STARTERS:</p> <ul style="list-style-type: none"> ➤ Who is my primary contact person? Is he or she a representative of an investment advisor or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

ROCKPORT WEALTH, LLC
doing business as
“Rockport Wealth Advisors”

CLIENT BROCHURE

This Brochure provides information about the qualifications and business practices of Rockport Wealth, LLC (doing business as “Rockport Wealth Advisors”). If you have any questions about the contents of this Brochure, please contact us (216) 226-4560 or via email to compliance@rockportwealth.com.

The information in this Brochure has not been approved or verified by or the United States Securities and Exchange Commission (“SEC”) or any state securities regulator. Registration does not imply a certain level of skill or training. Additional information about Rockport Wealth is available on the SEC’s Advisor Search website at www.adviserinfo.sec.gov.

Rockport Wealth’s CRD number is: 297122

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June 1, 2026

ITEM 2: MATERIAL CHANGES

Registered Investment Advisers are required to update their Form ADV 2 Brochures promptly with material changes and annually, within 90 days of each fiscal year end. Rockport Wealth, LLC dba "Rockport Wealth Advisors" filed its 2025 fiscal year end ADV 2A Brochure amendment with the United States Securities and Exchange Commission (SEC) on March 23, 2026. Since that filing, the following material changes have been made:

Item 4: Advisory Business

We removed references from **D. Wrap Program** stating that the wrap fee program is optional, as all accounts are now being opened under the wrap program and any legacy accounts are in the process of being moved under the wrap program.

Item 5: Fees, Compensation and Termination of Services

We removed references to legacy contract fees and billing arrangements as all accounts are in the process of being moved to monthly, advanced billing utilizing the fee schedule as stated in this section.

Item 17: Voting Client Securities

We removed any references to our proxy voting procedures as the firm no longer votes proxies on behalf of clients.

The following amendments have additionally been made within the past year:

Item 4: Advisory Business

The following information was added to **A. Description of the Advisory Firm** regarding the purchase of J Arnold Wealth Management:

In February of 2024, RWA purchased another registered investment advisor firm, J Arnold Wealth Management ("JAWM"). As of that date, the owner of JAWM, Jon Arnold, had no ownership role in RWA. A conflict of interest existed because a portion of the compensation paid to Mr. Arnold for the sale of his firm was dependent upon whether a significant number of the assets under management by JAWM transferring to RWA as part of the purchase. Mr. Arnold was to continue to work with RWA as an Investment Advisor Representative under RWA's supervision and as a consultant with RWA, participating in the Investment Committee alongside Joseph Kovach and Adam Stalnaker.

Later, it was discovered that JAWM's Form ADV Part 2A and Investment Management Agreement stated that fees would be charged according to total assets under management by household rather than by account. As part of our standard onboarding and account transition process, we may review certain historical account records relating to advisory services previously provided by another investment adviser. Based solely on the documentation made available to us, the fee calculations reflected in those records may not correspond in all respects with the billing methodology described in the applicable written advisory agreement between the client and the prior adviser.

Our firm was not involved in the prior adviser's fee calculation or billing processes and did not supervise or oversee such activities. Our review is limited in scope and is not conducted as an audit, verification, or comprehensive analysis of the prior adviser's records or practices. Accordingly, we make no representation regarding the accuracy, completeness, or appropriateness of any prior fee calculations.

Clients with questions regarding historical advisory fees should contact the prior investment adviser directly for clarification regarding the billing methodology applied.

This disclosure is provided for informational and transparency purposes only.

Mr. Arnold is no longer an Investment Advisor Representative of RWA, but he does currently act as a promoter of the firm.

Also, as Jon Arnold is no longer affiliated as an Investment Advisor Representative of Rockport Wealth Advisors, all references to J Arnold Wealth Management and Jon Arnold have been removed from this Brochure.

The following clarification was added in **B. Types of Advisory Services** regarding the treatment of billing and fees incurred for private placements not recommended by Rockport Wealth Advisors:

RWA will not hold outside private placements not recommended by the firm; RWA will assist in the facilitation of redemptions of these assets as needed and upon client request. For any legacy private placements not recommended by the Advisor but being held by RWA, these assets are not included in the wrap program. The Advisor will not bill the client on these assets, and the client is responsible for the alternative asset maintenance fee.

Additionally in **B. Types of Advisory Services**, covered calls and inverse ETF derivatives were added as investments that may be recommended by the firm (as appropriate based on each client's situation).

The following information was added regarding our Wrap Fee Program Disclosures in **B. Types of Advisory Services**

- All new accounts will be opened under our Wrap Fee Program.
- Some legacy accounts are not currently in a wrap program, but RWA will convert all accounts to wrap accounts in the near future.

Item 5: Fees, Compensation and Termination of Services

Under **A. Fee Schedules**, the fee schedule for all new accounts was updated to the following:

Account Value	Standard Fee Schedule
\$0 - \$500,000	1.25%
\$500,001 and above	1.00% or negotiable
<i>All fees are negotiable</i>	

The fees are charged based on a flat percentage using total account value (including cash and cash equivalent positions such as money market funds), as opposed to a tiered rate. The account value will be based upon the total value of all accounts attributable to the same household, so the same fee rate will be applied to each of those accounts. Different accounts within a household may have a different fee structure based on the assets involved. The agreed upon fee schedule and cadence will be established in the Advisor's Client Agreement.

For all new accounts, fees are paid monthly in advance, except for the initial month which is billed pro rata in arrears.

Please refer to Item 4.A for our discussion titled, "Wrap Fee Program Disclosures".

RWA has had different fee schedules in place in the past and, as stated above, our fees are negotiable at our discretion, which means that not all RWA clients are paying the same fees. Should moving to the fee schedule stated above lower your fees, we will automatically move you to the new, lower fee schedule. However, if moving to the above listed fee schedule would raise your fees, your legacy agreed upon fee will remain in place; if your fee was a negotiated fixed rate, your legacy agreed upon fee will remain in place. Please refer to your Client Agreement or reach out to RWA if you are unsure as to your agreed upon fee schedule. Your fees are paid monthly and according to the payment timing (arrears or advance) as specified in your Client Agreement.

The section titled **4. Fee Treatment of Alternative Investments and Private Placements** was added to further discuss the treatment of billing and fees incurred for private placements not recommended by Rockport Wealth Advisors

If the Advisor recommends any alternative investments or private placements for a client's portfolio (typically these will be investments in products such as Delaware Statutory Trusts or Opportunity Zones), the investment will be included as a part of the client's AUM for purposes of determining the fee charged; however any costs incurred by the alternative investment will be covered by the Advisor under our wrap program.

Any outside alternative investments or private placements not recommended by the Advisor, that are currently being held in an RWA account, will be excluded from billing. The client will be responsible for any additional costs or alternative asset maintenance fees for these products, even if these products are included within a wrap account, as the only service provided by RWA for these accounts would be to facilitate redemptions as requested by the client. The firm will no longer accept holding new outside private placements within RWA accounts that were not recommended by the Advisor; RWA will continue to help facilitate redemptions of these products as needed and upon client request.

Item 7: Types of Clients and Minimum Conditions

This section was updated to disclosure the firm's minimum account size:

The suggested account minimum for investment management services is \$250,000 but can be negotiated based upon individual circumstances.

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

The following risks were added in **C. Risks of Specific Securities Used** as some strategies utilized by RWA under certain circumstances may include the use of covered calls or inverse ETFs.

Covered Call Options. While this strategy can provide income, it limits your ability to participate in any increase in the price of the underlying security above the strike price. Furthermore, a covered call strategy does not eliminate the risk of market-based losses on the underlying stock. In fact, if the stock price declines, the premium received from the option may not be sufficient to offset the loss in the value of the underlying security. Additionally, the option can be exercised at any time, requiring you to sell the underlying security at the strike price, potentially below the market price. Market conditions can negatively impact option values or the ability to close positions favorably and the forced sale of shares upon assignment may trigger taxable events.

Inverse ETFs. This strategy is used to hedge client portfolios against market downturns or to seek returns that are the inverse of a specific benchmark on a daily basis. They are designed to achieve their investments objectives on a daily basis. They are not intended to track the underlying index over periods longer than a single day. Due to the effect of daily compounding, performance over longer periods can differ significantly from the inverse of the underlying index. In volatile markets, an inverse ETF may lose money even if the underlying index decreases over time. Holding inverse ETFs for longer than one trading session increases risk due to the compounding of returns. As such, these investments are generally considered unsuitable for long-term holding. These products may not achieve their stated objectives. If the market rises, the inverse ETF will lose value, and you may lose a significant portion or all of your principal investment.

Item 10: Other Financial Industry Activities and Affiliations

In **C. Registration Relationships Material** to this Advisory Business and Conflicts of Interest, the following was added regarding the accounting firm owned by Andrew Smith, a RWA Investment Advisor Representative.

Investment Advisor Representative, Andrew Smith, is the owner of an accounting firm and receives separate and customary payment for delivering any accounting related services. Some advisory clients may also be accounting clients of Mr. Smith. This creates a conflict in that Mr. Smith has an incentive to recommend his accounting firm to RWA clients and RWA to accounting clients. Clients are under no obligation to utilize Mr. Smith for any accounting services.

Item 12: Brokerage Practices

References to AXOS Clearing, WBI and Orion as custodians have been removed, as RWA is no longer utilizing these custodians for any new accounts. Also, it was added that for any investments in American Funds mutual funds, those will be held directly with the fund company.

The section titled **B. Aggregation and (Block) Trading for Multiple Client Accounts** was updated to disclose that, when in the best interest of the client, the firm will utilize block trading.

We can elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders,

batch trading or block trading and is used by our firm when RWA believes such action can prove advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

RWA uses the average price allocation method for transaction allocation. Under this procedure RWA will calculate the average price and transaction charges for each transaction included in a block order and assign the average price and transaction charge to each allocated transaction executed for the client's account.

Item 17: Voting Client Securities (Proxies)

This item was updated to reflect that as a matter of policy and practice, RWA will not vote proxies on behalf of clients for any accounts.

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ITEM 4: ADVISORY BUSINESS

A. DESCRIPTION OF THE ADVISORY FIRM

Rockport Wealth, LLC, doing business as “Rockport Wealth Advisors” (hereinafter referred to as the “**Advisor**” or “**RWA**”) was formed in May 2018. The Advisor is an Ohio limited liability company headquartered in Fairview Park, Ohio. The principal owners are ARS Capital Inc. and JJK Financial Inc. Adam R Stalnaker is the owner of ARS Capital Inc and Joseph John Kovach is the owner of JJK Financial Inc. Thomas V. David is the Advisor’s Chief Compliance Officer.

The Advisor is a registered investment adviser and as such is a fiduciary to each of its clients. The Advisor is registered with and regulated by the United States Securities and Exchange Commission (**SEC**). The Advisor is not a broker/dealer or insurance agency and therefore does not accept commissions. The Advisor is only compensated in the form of advisory fees paid by its clients.

In February of 2024, RWA purchased another registered investment advisor firm, J Arnold Wealth Management (“JAWM”). As of that date, the owner of JAWM, Jon Arnold, had no ownership role in RWA. A conflict of interest existed because a portion of the compensation paid to Mr. Arnold for the sale of his firm was dependent upon whether a significant number of the assets under management by JAWM transferring to RWA as part of the purchase. Mr. Arnold was to continue to work with RWA as an Investment Advisor Representative under RWA’s supervision and as a consultant with RWA, participating in the Investment Committee alongside Joseph Kovach and Adam Stalnaker.

Later, it was discovered that JAWM’s Form ADV Part 2A and Investment Management Agreement stated that fees would be charged according to total assets under management by household rather than by account. As part of our standard onboarding and account transition process, we may review certain historical account records relating to advisory services previously provided by another investment adviser. Based solely on the documentation made available to us, the fee calculations reflected in those records may not correspond in all respects with the billing methodology described in the applicable written advisory agreement between the client and the prior adviser.

Our firm was not involved in the prior adviser’s fee calculation or billing processes and did not supervise or oversee such activities. Our review is limited in scope and is not conducted as an audit, verification, or comprehensive analysis of the prior adviser’s records or practices. Accordingly, we make no representation regarding the accuracy, completeness, or appropriateness of any prior fee calculations.

Clients with questions regarding historical advisory fees should contact the prior investment adviser directly for clarification regarding the billing methodology applied.

This disclosure is provided for informational and transparency purposes only.

Mr. Arnold is no longer an Investment Advisor Representative of RWA, but he does currently act as a promoter of the firm.

“Investment Advisor Representatives” are those persons who are appropriately registered and authorized to deliver investment advisory services on behalf of the Advisor. Three of the Advisor’s investment advisor representatives, Adam Stalnaker, Joseph Kovach, and Michael Curley are separately engaged as registered representatives of an unaffiliated broker/dealer and are independently licensed insurance agents and as such can accept commissions for securities and insurance representatives in these capacities. These activities are discussed at Item 10.C of this Brochure.

B. TYPES OF ADVISORY SERVICES

The Advisor offers *fee-based* **Financial Planning, Investment Management, and Consultation Services**. The Advisor offers an initial, complimentary consultation to discuss the advisory services available; to give a prospective client an opportunity to review services desired; and to determine the possibility of a potential Client-Advisor relationship.

Stand-Alone Financial Planning Services

The Advisor's Financial Planning Services may be comprehensive in nature or can be tailored to address one or more components of financial planning. The services requested may include short-term and/or long-term goal planning as directed by the client. Financial Planning Services are available on an hourly basis, where services terminate at the conclusion of services, or the Advisor can be engaged to provide ongoing services. The services to be provided and the Advisor's fee(s) are agreed upon at the time of engagement and may include (as requested):

1. Initial Consultation (Free)
 - a. Assess current financial situation and discuss the planning process and the Advisor's services.
2. Detailed meeting to review the client's financial situation in depth in an effort to determine our client's objectives, goals, and concerns.
3. Prepare and deliver recommendations
 - a. Delivery of a financial plan including current net worth (balance sheet), documented goals, action items and more.
 - b. Recommendations
 - c. Client walkthrough of plan and any questions

Included in the ongoing planning services:

1. Regular check-ins with our client to assess the financial plan, implementation of the plan, limitations, adjustments needed and assess new variables in a client's financial picture.
2. Year-end review and discussion pertaining to the plan and identify necessary updates based on input from our client,
3. A new/updated financial plan annually.

Financial Planning Services can include the following topics (as agreed at engagement):

1. Income/Spending/Budgeting Analysis
2. Savings
3. Debt Strategies
4. Credit Card Reward Analysis
5. Tax Planning
6. Estate Planning
7. Retirement Planning
8. Education Planning
9. Employee Benefits Planning
10. Insurance Planning
11. Charitable Gift Planning

When financial planning services or information are limited, clients must understand that comprehensive planning needs and or objectives may not be fully considered due to the client's option to receive limited services, the lack of information received, and/or client disclosure.

When providing a review or advice on investments within retirement plans, the advice and any recommendations are limited to plan offerings and the service provider(s) selected by the plan providers.

Implementation of any advice or recommendations pertaining to securities or non-securities matters, in whole or in part, is entirely at the client's discretion via the service provider(s) of the client's choice.

Clients requiring assistance on issues relating to matters outside of financial and investment advisory topics should consult their personal tax adviser, legal counsel, or other professionals for expert opinions.

Financial Planning Services will not include any portfolio monitoring, investment reviews, or investment management. Investment management services may be available via a new client agreement.

Investment Management Services

The Advisor's investment management services are ongoing in nature, focus solely on portfolio management, and include financial planning services. This service does not include consultation services outside the scope of the managed investments. Investment Management Services are ongoing until terminated in writing by either party. These services are provided within this Rockport Wrap Fee Program, (as discussed in Appendix 1 of this Brochure), which provides for portfolio management fees for all assets including private placements recommended by the Advisor, as well as commissions, trade execution costs, custody, and other standard brokerage services within a single, bundled fee.

RWA will not hold outside private placements not recommended by the firm; RWA will assist in the facilitation of redemptions of these assets as needed and upon client request. For any legacy private placements not recommended by the Advisor but being held by RWA, these assets are not included in the wrap program. The Advisor will not bill the client on these assets, and the client is responsible for the alternative asset maintenance fee as charged by the custodian. Please be certain to read this Brochure as it discusses the Program as well as conflict of interest information and other important considerations.

Investment Management Services begin only after the Client and Advisor formalize the relationship with a properly executed client agreement. After the formal engagement and depending upon the scope of the engagement, the Advisor and client will share in a data gathering and discovery process in an effort to determine the client's stated needs, goals, intentions, time horizons, risk tolerance and investment objectives, based upon information provided by the client and the nature of services requested. The Advisor and its client will normally complete a risk assessment, investment policy statement ("IPS") or similar document, depending upon the scope of services to be provided.

After an analysis and data-gathering process and depending upon the nature of services requested, the Advisor may prepare reviews, analysis, asset allocation recommendations, and may recommend specific investments. The Advisor utilizes the information provided by the client to prepare portfolio recommendations or adjustments in an existing portfolio. The Advisor can tailor services as desired by the client, however where Investment Management Services or information are limited, clients must understand that comprehensive investment needs and or objectives may not be fully considered due to the client's option not to receive limited services, the lack of information received, and/or client disclosure.

The Advisor's financial planning services include all of the services outlined in the stand-alone service described above *with the following exceptions*: estate planning, charitable gift planning and credit card reward analysis. All financial planning services are client-initiated and are not transferrable (if not utilized).

Recommendations may include planning for long-range goals (i.e., retirement planning or college funding) or other segments of an investment plan that may be desired. Recommended investments will normally include (as appropriate for each client's stated situation): exchange traded index funds, mutual funds, other similar equity related index funds, stocks, bonds, real estate investment trusts, master limited partnerships, money market funds, U.S. treasury funds, cash sweep accounts, covered calls, inverse ETF derivatives and other liquid cash and cash-like vehicles.

Strategic Models

Certain RWA investment management services, referred to as the Strategic Models, provide for an alternative management style. The designed strategy utilized may involve certain investments being held for short terms. This approach is similar to a short-term market timing strategy and is not appropriate for every type of investor. It is also unlike a typical "style-box" strategy that remains fully invested in all market environments regardless of the risk/reward potential. The asset allocation model determines the percentage of assets that are appropriate to invest in equities, exchange traded funds ("ETFs"), bonds and cash and/or fixed income at any given time. From time to time, these management strategies may result in over-weighted positions in particular market sectors and/or industries, which can be more volatile and/or underperform relative to the market as a whole. *Please refer to Item 8.A of this Brochure for further investment strategy information.*

The strategy of the Strategic Models is limited to the types of investments noted in the previous paragraph. While the firm attempts to accommodate certain reasonable investment restrictions such as amounts invested in the types of investments, the other investment strategies available through RWA may be more appropriate for investors who would prefer an alternative to a more active risk on - risk off strategy with limited classes of investments.

Performance results for this investment style are best analyzed over a market cycle due to the fact that the strategies may not correlate to the broader market. As with most investment strategies, it may be possible that the value of a managed account may depreciate in value over periods of time when the overall market may (be up) (appreciate in value). The strategies seek to obtain consistent returns in a bull or bear market. There is no assurance that a model's goal will be realized. Obviously long-term or choppy markets can persist. As at Item 8 of this Brochure, no investment strategy can guarantee profits, and all investors must be prepared for an investment loss.

Investors should not expect to be fully invested at all times, as these strategies maintain the ability to move into money market or defensive positions either partially or fully (such as fixed income or money market funds). When in a money market, the investor loses the potential for market appreciation within the account. Further, after the application of advisory fees, the account will lose value. If during the engagement a client directs the Advisor to move all or a portion of assets into a money market fund, the Advisor takes no responsibility on timing the move out or back into the designed investment strategy as the client is electing to self-direct the account during that time.

Frequent trading may impact investment performance and tax implications. Investors should consult with their personal tax adviser in connection with securities transactions and/or any particular investment(s) held in their account(s).

These strategies may not be appropriate for every type of investor. The strategies may deploy short-term trading strategies in an effort to capitalize on shorter-term market moves and as a result, a higher number of transactions may occur over a relatively short period of time. More transactions could result in higher fees in individual accounts which is why the Advisor's wrap fee program is utilized, as discussed below and at Item 5 of this Brochure. Some mutual funds / fund families impose redemption charges on funds held for less than the required minimum period, as determined by the fund (ref. prospectus). While best efforts are made to avoid these charges, clients may incur them from time to time.

Wrap Fee Program Disclosures

- In order to evaluate whether a wrap [or bundled] fee arrangement is appropriate for you, you should compare the agreed-upon Wrap Program Fee and any other costs associated with participating in our Wrap Fee Program with the amounts that would be charged by other advisers, broker-dealers, and custodians, for advisory fees, brokerage and execution costs, and custodial services comparable to those provided under the Wrap Fee Program.
- All new accounts will be opened under our Wrap Fee Program.

Relative Cost of Wrap Fee Program

A wrap fee is not based directly on the number of transactions in your account. Various factors influence the relative cost of the Program to clients, including the cost of our investment advice, custody, and brokerage services if you purchased them separately, the types of investments held in your account, and the frequency, type and size of trades in your account. The program could cost you more or less than purchasing our investment advice and custody/brokerage services separately.

Conflict of Interest

When managing a client's account on a wrap fee basis, we receive as compensation for our investment advisory services, the balance of the total wrap [or program] fee you pay after custodial, trading, and other management costs (including execution and transaction fees) have been deducted.

The Advisor does not charge clients higher advisory fees based on their trading activity, but you should be aware that we have an incentive to limit our trading in your account(s) because we are charged for executed trades.

We encourage you to review Schwab's pricing to compare the total costs of entering into a wrap fee arrangement versus a non-wrap fee arrangement. If you choose to enter into a wrap fee arrangement, your total cost to invest could exceed the cost of paying for brokerage and advisory services separately. To see what you would pay for transactions in a non-wrap account please refer to Schwab's most recent pricing schedules available at <https://www.schwab.com/aspricingguide>.

Betterment Services

In addition to its in-house investment management services, the Advisor has entered into an agreement with Betterment, LLC ("Betterment") to utilize among other things, Betterment's software, advice, and digital services on a sub-advisory basis. This means the Advisor maintains its role as your primary investment adviser while utilizing the investment platform available through Betterment. In order to utilize this program, clients will sign a client agreement with Betterment. Betterment's services are not included in the Advisor's wrap fee program.

Betterment's program will recommend an investment plan via the digital interface that is based on Betterment's investment methodology regarding asset allocation strategies, ongoing portfolio management, and certain information and preferences provided by the Advisor and/or our client information (via the IPS). The Advisor and our client may adjust the IPS via the available options in the interface in order to provide further input for Betterment's discretionary investment management. The IPS memorializes the investment goals and strategic management policies governing our client's account.

Betterment may also make available certain model investment portfolios developed by third-party providers (each, a "Model Portfolio Provider") with products and/or allocations (a "Model Portfolio") that differ from the products and/or allocations Betterment has selected based on

Betterment's investment methodology. These investment opportunities are outside the realm of Betterment's IPS, and management and certain features of Betterment's digital interface may not work in conjunction with a given model portfolio. In such cases, The Advisor shall be responsible for managing the assets in a selected model portfolio.

The ongoing Investment Management Services provided are based upon the client's stated individual needs and objectives. In each case, the stated individual needs, goals, and desires of clients are taken into consideration. Clients utilizing the Betterment program will grant Betterment limited discretionary authority to implement securities transactions via the Betterment service agreement. The Advisor may also maintain limited discretion (with the client's authorization in the Advisor's client agreement) in order to assist clients with the implementation of the investment recommendations and portfolio changes. Within the Betterment program, the Advisor is not permitted to make withdrawals or deposits of funds, establish any sources for funding an account or destinations for withdrawals from an account, and will not have the authority to establish new Betterment accounts on a client's behalf.

Throughout its engagement, the Advisor will remain available for ongoing consultation, advice, and recommendations. The Advisor will provide ongoing monitoring of the portfolio in accordance with the directives provided. The underlying portfolio assets will be reviewed internally on a frequent basis (often daily), the client's portfolio will be internally reviewed no less than annually, but reviews may occur more frequently, depending upon the types of investments, market conditions, when the client reports (actual or potential) changes in their financial condition, at the discretion of the Advisor, and in conjunction with significant deposits or withdrawals. The review process is discussed at Item 13 of this Brochure.

Clients engaging in investment advisory services must play an active role. The Advisor requires its client to participate in the formation of the investment plan, the development of investment advice and recommendations and the ongoing services provided. Clients may call the office during regular business hours to discuss their portfolio or ask questions, but the Advisor recommends that clients initiate a meeting with the Advisor no less than annually. *However, clients are obligated to immediately inform the Advisor of any changes in their financial situation to provide the Advisor with the opportunity to review the new data to ensure the portfolio continues to be structured to help meet the client's stated needs and objectives.*

The Advisor is a fiduciary to its clients. As such, the Advisor is responsible for gathering an appropriate amount of information pertaining to its clients' financial situation, investment objectives, and any reasonable restrictions imposed (as well as changes thereto) When a client is utilizing our services with Betterment's management offerings, the Advisor is responsible for ensuring client data (and any material changes in data) is promptly provided to Betterment. The Advisor is also responsible for monitoring the client's account(s) on an ongoing basis. The Advisor will also help to ensure that its clients' personal data is accurate and current in-house and in Betterment's digital records. Betterment is solely responsible for investment management, best execution, portfolio reporting, fee calculation and withdrawals, and other services it agrees to provide within its respective program. Betterment's services are independent of any other services the Advisor may agree to provide to its client.

Delaware Statutory Trusts (DST) Investments

DST sponsors control the day-to-day operations of assets held under trust. Sponsors also are responsible for distributing monthly cash flow distributions, quarterly reporting, tax returns and performance reviews of the assets under their management. The Advisor will monitor the sponsor's regular reporting and asset performance updates and Client is responsible to ensure that the Advisor receives copies of all DST reports.

Investment Reports

If the Client has simultaneously engaged the Advisor for investment management services for other assets, the Advisor can include the assets under advisement in Advisor-generated

reports, if requested and where we have been granted access to or receive copies of the account statements.

Throughout the Advisement engagement, the Advisor will remain available by appointment to provide consultation services pertaining to the client's assets under advisement. Investment reviews will occur at client's request versus the ongoing and continuous monitoring and management of assets provided under the Advisor's investment management services.

The client should initiate a discussion with the Advisor at least annually to review important financial information so we can continue to ensure our Advisement services continue to be appropriate based on what we know about our client. Clients should otherwise promptly inform the Advisor of any financial issue that may arise which could materially affect the client's investment objectives and/or strategies as may be reported to the Advisor. The Advisor will promptly review the new information provided by the client to determine if the existing consultation services continue to align with changes in the client's stated situation.

3(21) Retirement Plan Services

The Advisor may act as a co-fiduciary 3(21) adviser to retirement plan sponsors. In our role as a 3(21) adviser, we typically provide advice to the plan sponsor, who is free to accept or reject those recommendations and who must then execute the decisions for the plan. Services are available through a negotiated fee as part of a written Agreement with the plan sponsor.

C. CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS

The Advisor focuses on providing individualized services. The Advisor can tailor services to focus only on certain portfolio components, depending upon the client's wishes and/or the nature of the engagement. However, where client services or information are limited, clients must understand that comprehensive investment needs and objectives may not be fully considered due to the client's option to receive limited services, the lack of information received, and/or client disclosure. The Advisor and the client will share in a data gathering and discovery process in an effort to determine the client's stated needs, goals, intentions, time horizons, risk tolerance and investment objectives, based upon information provided by the client and the nature of services requested. The client and Advisor may complete a risk assessment, investment policy statement ("IPS") or similar documentation, depending upon the nature of services to be provided.

Clients may impose reasonable restrictions pertaining to certain securities or types of securities in accordance with their values or beliefs and such instructions will be agreed to in writing between the client and the Advisor.

As noted at Item 4.A, The investment strategies utilized within the Strategic Models are generally limited to certain types of investments. While the firm attempts to accommodate certain reasonable investment restrictions such as amounts invested in the types of investments, the other investment strategies available through RWA may be more appropriate for investors who would prefer an alternative to a more active strategy with limited classes of investments.

Important Note About Retirement Plan Rollovers

As noted throughout this Brochure, the Advisor is a fiduciary to each of its clients. This includes when we provide investment advice to you regarding your retirement plan account or individual retirement account, within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interests ahead of yours. At the time of a rollover recommendation, we will provide you with a written disclosure discussing the reasons the rollover is in your best interests. Also, under this special rule's provisions, we must:

- * Meet a professional standard of care when making investment recommendations (give prudent advice).
- * Never put our financial interests ahead of yours when making recommendations (give loyal advice).
- * Avoid misleading statements about conflicts of interest, fees, and investments
- * Follow policies and procedures designed to ensure that we give advice that is in your best interest.
- * Charge no more than is reasonable for our services; and
- * Give you basic information about conflicts of interest.

Self-Directed Assets

Clients may desire to place or keep certain assets within client's account(s) that have been / are selected by the client and are not the subject of investment advice by the Advisor. These are known as "self-directed" assets. The Advisor will not manage this facet of the client's portfolio. The Advisor will therefore have no responsibility to provide consultation, suitability reviews, due diligence research or any other services relating to the self-directed assets in client's account(s) and will therefore have no liability for any loss relating to self-directed assets. Should the Advisor ever agree to assist a client with a transaction involving a self-directed asset, it will do so only as a value-added service.

D. WRAP FEE PROGRAM

The Advisor is the portfolio manager and sponsor of the Rockport Wealth Wrap Fee Program. (the "Program"). The Program combines portfolio management and trade execution costs within a single investment management fee. Rockport Wealth, as the Program's manager is responsible for research, security selection, and implementation of transaction orders in the Client's account.

Schwab's Brokerage Services

In addition to the advisory services, the wrap fee program includes certain brokerage services of Charles Schwab & Co., Inc. ("Schwab") a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. We are independently owned and operated and not affiliated with Schwab. Schwab will act solely as a broker-dealer and not as an investment advisor to you. It will have no discretion over your account and will act solely on instructions it receives from us [or you]. Schwab has no responsibility for our services and undertakes no duty to you to monitor our management of your account or other services we provide to you. Schwab will hold your assets in a brokerage account and buy and sell securities and execute other transactions when we [or you] instruct them to. The Advisor and the Program will not open the account for you.

Fees We Pay Schwab

In addition to compensating the Advisor for advisory services, the wrap fee clients pay allows the Advisor to pay for brokerage services provided by Schwab.

The Program fee does not include mark-ups, and mark-downs, dealer spreads or other costs associated with the purchase or sale of securities, interest, taxes, or other costs, such as charges for transactions not executed through Charles Schwab & Co., Inc., costs associated with exchanging currencies, wire transfer fees, or other fees required by law or imposed by third parties. The investor's account will be responsible for these additional fees and expenses.

As a fiduciary, an investment adviser must have a reasonable basis to believe that a wrap fee program is in the best interest of participating clients since high management fees normally apply to such programs. Further, depending on the level of trading required for the Client's account[s] in a particular year, the client may pay total fees that are more or less than if the client paid its own transaction fees.

Detailed information about The Rockport Wealth Wrap Fee Program is provided in the Form ADV Part 2A, Appendix 1 (Wrap Fee Program Brochure) which is attached to this Form ADV Part 2A Disclosure Brochure.

E. AMOUNTS OF ASSETS UNDER MANAGEMENT

The Advisor managed \$676,427,261 in 3004 discretionary accounts as of December 31, 2025.

ITEM 5: FEES, COMPENSATION AND TERMINATION OF SERVICES

A. FEE SCHEDULES

Financial Planning

The Advisor's negotiable hourly fee ranges between \$200 - \$400. The fee rate will be determined and agreed upon at engagement, based on the scope and/or complexity of services.

Investment Management Services

As discussed in Item 4.D of this Brochure (and in Appendix 1, the Program Brochure), the Advisor's Investment Management fees are calculated as a percentage of assets under management by household and combines portfolio management, commissions, trade execution costs, custody, and other standard brokerage services within a single investment management fee under The Rockport Wealth Wrap Fee Program. The wrap fee does not include separate administrative costs that may be charged by sponsors of mutual funds or excluded funds held in the account. **The agreed upon annual fee is negotiable**, based on the nature, complexity, and scope of services as well as the amount and nature of assets to be managed, pre-existing relationships, and other factors, at the discretion of the Advisor as follows:

Account Value	Standard Fee Schedule
\$0 - \$500,000	1.25%
\$500,001 and above	1.00% or negotiable
<i>All fees are negotiable</i>	

The fees are charged based on a flat percentage using total account value (including cash and cash equivalent positions such as money market funds), as opposed to a tiered rate. The account value will be based upon the total value of all accounts attributable to the same household, so the same fee rate will be applied to each of those accounts. Different accounts within a household may have a different fee structure based on the assets involved. The agreed upon fee schedule will be established in the Advisor's Client Agreement.

Fees are paid monthly in advance, except for the initial month which is billed pro rata in arrears.

Please refer to Item 4.A for our discussion titled, "Wrap Fee Program Disclosures".

RWA has had different fee schedules in place in the past and, as stated above, our fees are negotiable at our discretion, which means that not all RWA clients are paying the same fees.

The investment management fee may be revised during the engagement, particularly if different needs and/or complexities arise, or the scope of services should change. In such cases, the Advisor will notify the client of its intention to modify the fee with at least 30 days' written notice. Should the client decide not to accept the amended fee terms, the client is welcome to terminate services with 5 days' written notice prior to the effective date of the fee modification.

While the Advisor takes the position that its fees are competitive, fees may be higher or lower than fees charged by other financial services providers for similar services.

Fee Treatment of Alternative Investments and Private Placements

If the Advisor recommends any alternative investments or private placements for a client's portfolio (typically these will be investments in products such as Delaware Statutory Trusts or Opportunity Zones), the investment will be included as a part of the client's AUM for purposes of determining the fee charged; however any costs incurred by the alternative investment will be covered by the Advisor under our wrap program.

Any outside alternative investments or private placements not recommended by the Advisor, that are currently being held in an RWA account, will be excluded from billing. The client will be responsible for any additional costs or alternative asset maintenance fees for these products, even if these products are included within a wrap account, as the only service provided by RWA for these accounts would be to facilitate redemptions as requested by the client. The firm will not accept holding new outside private placements within RWA accounts that were not recommended by the Advisor; RWA will continue to help facilitate redemptions of these products as needed and upon client request.

Performance-Based Fee Arrangements

For Qualified clients, as defined by the Securities and Exchange Commission, the Advisor may negotiate a fee based on a combination of a percentage of assets under management and a performance fee. In such cases, the Advisor charges a maximum asset management fee of 10% of the annual gross profits for the account in performance fees. The performance fee is invoiced directly to the client and is payable annually, in arrears. No performance fee will be charged, except to the extent that the amount of capital increase exceeds the sum of any cumulative loss in the account on a yearly basis. In the event the client makes a complete withdrawal from the account on a date other than the end of the year, fees will be due at the time of withdrawal. Annual gross profits are defined as the difference in the value of the account for the previous 4 quarters, adjusted for deposits and withdrawals made during the year. Please see important disclosures in Item 6 of this Brochure which discusses side-by-side management.

For Clients Utilizing Betterment's Services

Betterment collects the total investment management fee of .75% and retains .25% for its sub-advisory services in accordance with its separate agreement with our clients. The Advisor is compensated for its investment management services at annual rate of .50% of the assets under management. Fees associated with this program are invoiced quarterly in arrears and are based on the portfolio value on the last market day of the prior quarter, as determined by the client's custodian. Each quarter's fee is calculated by multiplying the portfolio value by the annual fee and dividing the sum by 4. A pro-rata fee is calculated for services initiated at any time other than at the beginning of a calendar quarter.

Consultation Services

The Advisor's negotiable hourly fee ranges between \$200 - \$400. For larger projects, the Advisor may propose a project fee, using the Advisor's hourly rate as a guide. The Advisor's fee for consultation on Delaware Statutory Trusts (DSTs) involves a minimum fee of \$5000. The services and the fee will be agreed upon at engagement, based on the scope and/or complexity of services.

If the Advisor agrees to provide ongoing consultations for **Assets under Advisement**, the Advisor and our client will agree on a negotiable annual fee based on the percentage of the Assets under Advisement.

DSTs have no readily available market value throughout the year. These investments may experience asset appreciation or depreciation, but RWA and Client agree to base RWA's advisement fee on the asset value at the time of the initial investment.

B. PAYMENT OF FEES

Financial Planning

The Advisor's fees are paid directly to the Advisor.

Investment Management and Assets Under Advisement

For Investment Management Services, the Advisor's contractually agreed fees will be deducted from clients' custodial accounts with our client's authorization. The Advisor adheres to the following required criteria when payment is deducted from the client's account via a qualified custodian, as required by the SEC as follows: 1) The client provides written authorization permitting the fees to be paid directly from the client's account held by the independent qualified custodian and the authorization is limited to withdrawing contractually agreed upon investment advisor fees; (2) The client will directly receive regular account statements directly from the qualified custodian which reflect the Advisor's fee deduction; (3) The frequency of fee withdrawal shall be specified in the written authorization/client agreement; 4) The custodian of the account shall be advised in writing of the limitation on the Advisor's access to the account and; (5) The client shall be able to terminate the written billing authorization or agreement at any time.

Betterment's separate agreements with clients and the Advisor provide authority for Betterment to directly debit advisory fees from clients' accounts via the qualified custodian holding clients' funds and securities, and to disburse the Advisor's portion to the Advisor. Betterment is required to follow the same criteria outlined in the above paragraph when deducting fees via client accounts held at a qualified custodian.

It is important to note that custodial firms do not verify advisory fees. Therefore, clients should review their custodial statements carefully. If a client should have any questions or concerns in connection with an advisory fee deduction, they should promptly contact the Advisor and Betterment. If at any time during the engagement, the client fails to receive the regular statements produced by the custodian or they have new address information to report, it is important for the client to promptly notify the Advisor and their custodian.

Consultation Services

The Advisor's consultation fees are paid directly to the Advisor. For project-based services, the Advisor may request ½ of the proposed fee at the time of engagement, with the balance due at the conclusion of services. Because services relating to Delaware Statutory Trusts are time sensitive, the entire project fee may be due at engagement. However, the Advisor does not collect fees of \$1200 or more for services to be performed six or more months in advance.

C. FEES ASSOCIATED WITH INVESTING

Clients are responsible for any fees outside of transaction fees and brokerage commissions covered through the wrap program associated with their particular accounts (e.g., account opening, maintenance, transfer, termination, wire transfer, electronic funds transfer, retirement plan, trust fees, taxes, and all such applicable third party fees).

All fees paid to the Advisor for advisory services are separate from the fees and expenses charged to shareholders of exchange traded funds (ETFs) or mutual fund shares offered by mutual fund companies. A complete explanation of the expenses charged by a mutual fund or

ETF is contained in the respective fund prospectus. Clients are encouraged to read each prospectus and securities offering document. If a mutual fund previously purchased by or selected by a client should impose a sales charge, a client may pay an initial or deferred sales charge. The Advisor does not receive any portion of these investment-related fees. Such charges, fees and commissions are exclusive of and in addition to the Advisor's fees. However, in their separate capacities as registered representatives of an unaffiliated broker/dealer, certain of the Advisor's investment advisor representatives accept commissions for securities recommendations as discussed at Item 5.E of this Brochure.

The Advisor recommends certain brokerage firms and custodians as discussed at Item 12.A of this Brochure.

D. PREPAYMENT OF FEES

Financial Planning

Either party may terminate the financial planning agreement by written notice to the other. Clients may terminate the financial planning agreement without penalty or fees due within five business days of signing the Financial Planning Agreement if the Advisor's Form ADV 2A Brochure was not provided at least 48 hours prior to engagement. Thereafter, clients may terminate the Financial Planning Agreement upon written notice to the Advisor. Where services are terminated prior to the end of the conclusion of hourly services, the Advisor will only invoice for time and effort up until the effective date of termination. If the ongoing planning services are terminated by the client prior to the end of the pre-paid monthly billing, the fee will not be refunded. If the Advisor terminates the ongoing services prior to the end of the pre-paid billing, a pro-rated fee will be refunded.

Investment Management

The client may terminate services within five business days of signing the investment management agreement and without penalty or fees due if the Advisor's Form ADV 2 Brochure (and Betterment's Brochure, if applicable) was not delivered at least 48 hours prior to engagement. Thereafter, clients or the Advisor may terminate investment management services with five business days' written notice. The Advisor will promptly return a pro-rated refund of unearned fees accompanied by documentation of the refund calculation.

Betterment's services can be terminated in accordance with the termination provisions in the Betterment client agreement.

Consultation Services

Clients may terminate consultation services and receive a full refund of any pre-paid fees within five business days of signing the Consultation Agreement if the Advisor's Form ADV 2 Brochure was not delivered at least 48 hours prior to engagement. Alternatively, either party (the Client or the Advisor) may immediately terminate consultation services at any time with written notice to the other. The Advisor will only charge the agreed upon fee for services provided up until the effective date of termination. If any portion of the Advisor's fees were pre-paid, the Advisor will provide a prompt refund of unearned fees accompanied by information as to how the refund was calculated. For services provided to Assets under Advisement, the Advisor will promptly return a pro-rated refund of prepaid but unearned fees accompanied by documentation of the refund calculation.

E. OTHER COMPENSATION FOR THE SALE OF SECURITIES OR OTHER INVESTMENT PRODUCTS TO CLIENTS

The Advisor is a fee-based Registered Investment Advisor and only receives compensation in the form of investment advisory fees paid directly by clients.

Outside business activities (financial and investment related):

Adam R. Stalnaker, Joseph J. Kovach, and Michael A. Curley are separately engaged as registered representatives of an unaffiliated broker/dealer (Private Client Services LLC) and receive commissions for securities transactions placed with this broker/dealer.

Adam R. Stalnaker, Joseph J. Kovach, and Michael A. Curley are separately engaged as independently licensed insurance agents and receive normal commissions paid by insurance companies when clients purchase insurance through them.

Investment Advisor Representative, Andrew Smith, is the owner of an accounting firm and receives separate and customary payment for delivering any accounting related services.

The outside business activities described above present a conflict of interest. The Advisor's investment advisor representatives who are dually registered with an unaffiliated broker/dealer receive commissions for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds to investors in connection with these outside activities. In addition, if clients purchase insurance products from our personnel members who are licensed insurance agents, they will receive normal commissions paid by insurance companies. These activities present a conflict of interest and give our registered personnel an incentive to recommend products based on the compensation received rather than the client's needs.

It would be rare for the Advisor's insurance licensed personnel to recommend annuity products to the Advisor's clients.

The Advisor is a fiduciary to each of its clients. When making a recommendation to utilize the services associated with our investment advisor representatives' outside business activities to the Advisor client, we must act in the best interest of that client and must exercise reasonable due diligence, care, and skill in making such a recommendation, without placing financial or other interest ahead of our client's interests. The Advisor would infrequently recommend a security product that involves a commission to an investor who is a client of the Advisor. However, certain clients, such as those who are new to investing and do not have investable assets of a size that is appropriate for investment management services may have engaged the Advisor for consultation or financial planning services. The Advisor would normally recommend that the investor establish an account with Charles Schwab & Co., Inc. and may provide specific recommendations (as to *no-load* mutual funds, etc.), depending on the scope of the engagement. In the rare instance a former planning or consultation client desires to purchase a commission-based product, a written commission disclosure statement is provided at the time of the recommendation.

Care obligation: In making annuity recommendations, the representative who is insurance licensed must exercise reasonable diligence, care, and skill to 1. Know the consumer's financial situation, insurance needs and financial objectives; 2. Understand the available recommendation options after making a reasonable inquiry into options available to the agent; 3. Have a reasonable basis to believe the recommended option effectively addresses the consumer's financial situation, insurance needs and financial objectives over the life of the product, as evaluated in light of the consumer profile information; and 4. Communicate the basis or bases of the recommendation. In the case of an exchange or replacement of an annuity, insurance agents must consider the whole transaction, which includes taking into consideration whether: 1. The advisory client / consumer will incur a surrender charge, be subject to the commencement of a new surrender period, lose existing benefits, such as death, living or other contractual benefits, or be subject to increased fees, investment advisory fees or charges for riders and similar product enhancements; 2. The replacing product would substantially benefit the consumer in comparison to the replaced product over the life of the product; and 3. The consumer has had another annuity exchange or replacement and, in particular, an exchange or replacement within the preceding 60 months.

Commission Disclosure: As noted above, in the rare instance a former planning or consultation client desires to purchase a commission-based product, a written commission disclosure statement is provided at the time of the recommendation. As to insurance products, the licensed agent will provide the commission and/or fee information to the client on a fully disclosed basis and the disclosure will include a statement referring the client to the disclosure documents and buyer's guide (prepared by the annuity company, which may be particular to Ohio and other states that adopt similar disclosure requirements) provided to the consumer at time of purchase as it these materials provide additional information about the annuity.

The Advisor has established, maintains, and enforces written policies and procedures reasonably designed to address conflicts of interest and fiduciary responsibilities. Further, the Advisor will maintain appropriate records pertaining to client recommendations and how the conflicts of interest were addressed.

Clients Have the Option to Purchase Recommended Products from Other Brokers. Clients are never obligated to purchase recommended products or services. Clients always have the option to purchase recommended products through other brokers or insurance agents that are not affiliated with the Advisor. Clients are also welcome to disregard recommendations in whole or in part, entirely at their discretion.

The Advisor does not accept commissions. Only those investment advisor representatives who are appropriately registered or licensed (as discussed in this section) are eligible to receive commissions associated with their outside business activities. Commissions are not our investment advisor representative's primary source of revenue and any securities commissions associated with *advisory* clients would be negligible.

Advisory Fees in Addition to Commissions or Markups. The Advisor's fees charged to its clients are not reduced to offset the commissions associated with investment and insurance products that may be recommended to clients.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

As disclosed in Items 4 and 5 of this Brochure, the Advisor may enter into performance-based fee arrangements with qualified clients. The Advisor may receive incentive fees based on a share of capital gains or capital appreciation of the assets or any portion of the assets of an advisory Client, in accordance with the investment management agreement executed between the client and Advisor, in compliance with the requirements set forth in applicable laws and regulations. The performance fees charged by the Advisor may be higher or lower than fees charged by other advisers for comparable services.

Clients should be aware that a performance-based fee arrangement can create an incentive for the Advisor to recommend investments that are riskier or more speculative than those recommended under a different fee arrangement. The Advisor works to mitigate this conflict by selecting investments that we believe are appropriate for clients in accordance with the Advisor's and the client's investment strategies; The Advisor has established procedures designed and implemented to (i) ensure that all clients are treated fairly and equally, and (ii) prevent potential conflicts with respect to allocations of investment opportunities among clients.

ITEM 7: TYPES OF CLIENTS AND MINIMUM CONDITIONS

The Advisor offers investment advisory services to individuals and high net worth individuals.

The suggested account minimum for investment management services is \$250,000 but can be negotiated based upon individual circumstances.

A client seeking performance-based services, as discussed at Item 5.A of this brochure, must meet the definition of a qualified client as established by the United States Securities and Exchange Commission (assets under the Advisor's management of at least \$1,100,000, or a minimum liquid net worth of \$2,200,000).

Since ongoing investment management services may not be appropriate for some investors, the Advisor reserves the right to decline to provide services to any person or firm and for any reason.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

The Advisor provides personalized investment management services to its clients and portfolio advice is available for clients interested in conservative to moderately aggressive strategies; with advice designed to meet varying needs of and within the direction set forth by the investors. The Advisor seeks to design advice that is best suited to a client's stated unique needs after clients have defined their objectives, risk tolerance and time horizons and the selection is approved by the client.

Based on information provided by the client, the Advisor seeks to evaluate an investor's risk tolerance, time horizon, goals and objectives through an interview and data-gathering process in an effort to determine an investment strategy and portfolio design to best fit the investor's profile. The Advisor may recommend the investment management services offered by Betterment or the model portfolio offerings within Betterment's service offerings.

Client participation and the client's delivery of accurate and complete information are critical to the Advisor's process. In performing its services, the Advisor is not required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information.

The Advisor considers securities investments based on its professional judgment and the experience of its investment advisor representatives coupled with publicly available research and analysis. Asset allocation software and historical performance modeling software may also be utilized. Of course, no method of analysis can guarantee success. The Advisor's recommended investment strategies may be based upon a number of concepts and determined by the type of investor. This process attempts to coordinate the client's objectives for risk vs. return with the Advisor's analysis of the macro environment. Registered funds are researched and monitored internally by the Advisor with a process that emphasizes investment philosophy, management quality, and overall expense ratios. Portfolio holdings or recommendations are generally judged by track record and performance of like-kind investments. While pure market timing strategies are generally not used, Selected Models from RWA may employ risk on strategies when indicators and market conditions warrant as well as risk reduction strategies during times of heightened market volatility.

Changing conditions in the client's financial life or significant changes in market conditions may warrant a collaborative effort with the client to modify their strategic investment framework, which consequently may also trigger changes to investment holdings within the portfolio.

The Advisor may recommend the services of itself as Investment Advisor, its Investment Advisor Representatives in their individual capacities as investment managers, and the services of other industry entities to implement recommendations (such as an unaffiliated sub-adviser and unaffiliated brokerage and custodial firms). Any other professional referrals (*i.e.*, accounting professionals, tax preparers, legal professionals, etc.) may be provided but *solely* a courtesy and the Advisor and its personnel receive no direct or indirect compensation as a

result of referrals. Clients are welcome but are never under any obligation to act upon any of the recommendations made by the Advisor or to engage the services of any recommended service firm or professional including the Advisor itself. Clients should appropriately research other service providers before engaging those services.

Investors may prefer to utilize the investment management styles offered via the Strategic Models. These strategies fall within one of 3 general categories: conservative, moderate/balanced and growth. Each model generally holds the same positions but with different percentages based on the amount of risk involved. These positions may include the use of stocks, exchange traded funds, and mutual funds. The tactical nature of the strategy allows the flexibility to move away from equity positions to cash or bonds when risk is deemed high. *Please reference Item 4.B of this Brochure for additional information provided about these strategies.*

Investment analysis is both Fundamental and Technical in nature. Stock market indexes, individual stocks, and ETFs are monitored for buy and sell zones as well as confirming overbought or oversold conditions. Fundamental analysis involves a close review of economic indicators such as employment trends, Leading Economic Index and the Yield Curve most of which can be found in Y Charts software.

No strategy can promise a positive result or guard against loss. Frequent trading may impact investment performance and tax implications. Investors should consult with their personal tax adviser in connection with securities transactions and/or any particular investment(s) held in their account(s).

It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear.

B. MATERIAL RISKS INVOLVED

The Advisor takes the general position that investors with diverse portfolios have a better chance of making a profit because it is difficult to accurately predict the movement of the economy. However, no single strategy can be relied upon to outperform the market. RWA does not attempt to time the market. Frequent trading is not recommended as it can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. RWA does not generally recommend short sales and margin transactions as they are generally associated with greater risk. **In contrast, the Strategic Models**, as discussed at Items 4 and 8 of this Brochure, do seek to time investments. Please refer to these sections for important information concerning this manager's strategies.

Clients may make additions to and withdrawals from the account at any time, subject to customary securities settlement procedures and the Advisor's right to terminate services (such as when assets dip so low as to make investment management inappropriate for the client). Asset withdrawals may impair the achievement of a client's investment objectives.

All investment strategies involve risk and may result in a loss of an investor's original investment. Many of these risks apply equally to stocks, bonds and any other investment or security. Identified material risks associated with the Advisor's investment strategies include:

Defensive Risk: To the extent that the strategy attempts to hedge or take defensive measures such as holding a significant portion of its assets in cash or cash equivalents, the objective may not be achieved.

External Events: As we know from recent events, the market can be impacted by external events such as pandemic, supply chain issues, natural disasters, terrorism, war, etc.

Fixed Income Risk: Fixed income securities are subject to the risk of the issuer's or a guarantor's inability to meet principal and interest payments on its obligations and to price volatility. Fixed-income securities are generally subject to the following risks:

- **Interest Rate Risk.** The value of investments in fixed-income securities will change based on changes in interest rates. If interest rates increase, the value of these investments generally decline. Securities with greater interest rate sensitivity and longer maturities generally are subject to greater fluctuations in value.
- **Extension Risk.** If interest rates rise, repayments of principal on certain fixed-income securities may occur at a slower-than-expected rate and, as a result, the expected maturity of such securities could lengthen which could cause their value to decline.
- **Credit Risk.** Fixed income investments are subject to the risk that issuers and/or counterparties will fail to make payments when due or default completely. Prices of the investments may be adversely affected if any of the issuers or counterparties are subject to an actual or perceived deterioration in their credit quality. Credit spreads may increase, which may reduce the market values of fixed income securities. Credit spread risk is the risk that economic and market conditions or any actual or perceived credit deterioration may lead to an increase in the credit spread (i.e., the difference in yield between two securities of similar maturity but different credit quality) and a decline in price of the issuer's securities.
- **Prepayment Risk.** Issuers of certain fixed income securities may be able to prepay principal due on these securities, particularly during periods of declining interest rates, and Villere may have to invest the proceeds in lower-yielding securities.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

International Investing Risk: Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social, or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, and regulatory and financial reporting standards, which differ from those of the U.S.

Investment Strategy Risk: This risk exists when an Advisor's strategy may fail to produce the intended results.

Large-Sized Companies Risk: Larger, more established companies may be unable to respond quickly to new competitive challenges like changes in consumer tastes or innovative smaller competitors. In addition, large-cap companies are sometimes unable to attain the high growth rates of successful, smaller companies, especially during extended periods of economic expansion.

Legal or Legislative Risk: Legislative changes or court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Margin Transactions: Investors utilizing margin accounts must carefully review the margin agreement provided by the selected brokerage firm. These firms charge interest on the funds loaned to purchase securities on margin and an investor needs to understand the additional charges he or she may incur by opening a margin account. Additionally, risks associated with margin accounts include: The loss of more funds that an investor deposits into the margin which may require the investor to deposit additional funds to avoid the forced sale of securities in the account. Additionally, if the equity in the account falls below the maintenance margin requirements under the law or the firm's higher "house" requirements, the firm can sell the securities in the account to cover the margin deficiency. Investors are also responsible for any short fall in the account after such a sale. Additionally, the selected firm can sell the securities in the account without contacting the investor (although as a courtesy many firms do attempt contact). Investors are not entitled to a time extension on margin calls. While extensions are sometimes given under certain conditions, investors do not automatically have a right to time extensions. An investor does not have a right to an extension of time to meet a maintenance margin call.

Market Risk: Market risk involves the possibility that an investment's current market value will decline due to general market decline, thus reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Market Capitalization Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the clients' portfolios.

Small- and Medium-Sized Companies Risk: Investing in securities of smaller companies including micro-cap, small-cap, medium-cap and less seasoned companies often involve greater volatility than investing in larger, more established companies and these securities may be less liquid than other securities.

Political Risk: The chance that a change in government may affect stock prices of domestic or international stocks.

Sector/Industry Risk: In connection with Jon Arnold's management strategy, from time to time, client portfolios may have overweighted positions in particular market sectors and/or industries, which can be more volatile and/or underperform relative to the market as a whole.

Style Risk: The Advisor's strategy may consist of "value" and or "growth" investments. With respect to securities and investments considered undervalued by the Advisor, market prices may not reflect our determination that the security is undervalued, and its price may not increase to what we believe to be its full value and may even decrease in value. With respect to "growth" investments, the underlying earnings or operational growth anticipated may not occur, or the market price of the security may not increase as anticipated.

In connection with the investment strategies associated with the Strategic Models, the risk of a risk-on/ risk-off based analysis is that technical analysis might not accurately predict future price movements. Current prices of securities can reflect all information known about the security and day-to-day changes in market prices of securities, can follow random patterns and might not be predictable with any reliable degree of accuracy.

Tax Considerations: The Advisor's strategies and investments can have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Unaffiliated Money Managers: If a portion of your assets is managed by a third-party money manager (such as Betterment), we will not determine the investments to be made for your account, but we will monitor the investments in the accounts and advise you on those holdings for so long as we are providing investment management services.

Other (non-securities)

Annuities are retirement products for those who may have the ability to pay a premium now and want to guarantee they will receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirements or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Clients are hereby advised to read each offering document carefully before investing. Past performance is not a guarantee of future returns.

Investing in securities involves a risk of loss that all clients should be prepared to bear.

C. RISKS OF SPECIFIC SECURITIES UTILIZED

The Advisor generally seeks investment management strategies that do not involve significant or unusual risk beyond that of the general domestic and / or international equity markets. Investing in the financial markets, including the securities The Advisor recommends to clients, involves the risk of loss—including loss of principal. While the Advisor attempts to manage risks associated with the financial markets and the securities it recommends to clients, the Advisor makes no guarantee or promise that advice given will not result in losses. Past investment performance of any investment is not a guarantee of future results.

Investments in mutual funds may bear a risk of investment loss. Clients who invest should also be prepared to bear a loss of investment proceeds. While the Advisor monitors underlying fund investments, it is possible that a fund manager's strategy will not provide desired results.

Exchange traded funds (ETFs) - ETF Risks, including Net Asset Valuations and Tracking Error: ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate. Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by the Advisor plus any management fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a client's portfolio performance or an index benchmark comparison. Expenses of the fund may include investment adviser management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Investments in individual stocks can be risky. Some risks can be controlled, and some risks

can be guarded against, but no investment strategy can carry guarantees from loss. Certain market risks cannot be controlled, such as market or economic conditions. Certain strategies may be employed to adjust portfolios, or the Advisor and client may agree to hold the portfolio's course. The Advisor designs portfolio strategies for the long-term, unless otherwise specifically requested in writing. Therefore, the Advisor does not attempt to time the market.

Fixed income investments generally are utilized as a portfolio diversification element as well as for income-driving investments outside of equity exposure.

There are certain risks involved in investing in bonds: Government, Municipal, and Corporate and the following is an overview of the types of risks that one should consider: Interest rate risk; reinvestment risk; inflation risk; mark risk, selection risk, timing risk, and price risk. Additional risks for some government agency, corporate and municipal bonds may include Legislative risk (a change in the tax code could affect the value of taxable/tax-exempt interest income); Call risk (some corporate, municipal and agency bonds have a "call provision" entitling their issuers to redeem them at a specified price on a date prior to maturity. Declining interest rates may accelerate the redemption of a callable bond, causing an investor's principal to be returned sooner than expected. In that scenario, investors have to reinvest the principal at the lower interest rates. If the bond is called at or close to par value, as is usually the case, investors who paid a premium for their bond also risk a loss of principal. In reality, prices of callable bonds are unlikely to move much above the call price if lower interest rates make the bond likely to be called. Additionally, there may be a liquidity risk involved if investors may have difficulty finding a buyer when they want to sell and may be forced to sell at a significant discount to market value. Liquidity risk is greater for thinly traded securities such as lower-rated bonds, bonds that were part of a small issue, bonds that have recently had their credit rating downgraded or bonds sold by an infrequent issuer. Bonds are generally the most liquid during the period right after issuance when the typical bond has the highest trading volume. Additional risks for corporate and municipal bonds may include Credit risk; default risk; event risk and duration risk.

Bank obligations, including bonds and certificates of deposit, may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are highly dependent upon short-term interest rates and may be adversely affected by downturns in the U.S. and foreign economies and/or changes in regulations.

Delaware Statutory Trusts. These investments have a unique set of risks and are only appropriate for accredited investors. Risks may include but are not limited to: Illiquidity risk (investment must be held for an extended period of time), loss of control (no decision making over property, sponsor controls management and selling of property), regulatory risk (change in tax rules which could result in tax liabilities), execution risk (operator competence) and economic risk. There can be no assurance that a property will perform as projected and Delaware Statutory Trusts are subject to economic volatility, tenants not paying their rent as expected, and other traditional risks of owning, selling, and operating real estate. The fees and expenses of each offering should be carefully evaluated. Multiple owner offerings typically have additional expenses versus owning real estate on your own and these fees should be weighed against specific capital gains tax liability. All investors are encouraged to have their tax and legal counsel advise them on taxes including any federal and state capital gains taxes, depreciation recapture and any other tax issues, which could be applicable.

Covered Call Options. While this strategy can provide income, it limits your ability to participate in any increase in the price of the underlying security above the strike price. Furthermore, a covered call strategy does not eliminate the risk of market-based losses on the underlying stock. In fact, if the stock price declines, the premium received from the option may not be sufficient to offset the loss in the value of the underlying security. Additionally, the option can be exercised at any time, requiring you to sell the underlying security at the strike price, potentially below the market price. Market conditions can negatively impact option

values or the ability to close positions favorably and the forced sale of shares upon assignment may trigger taxable events.

Inverse ETFs. This strategy is used to hedge client portfolios against market downturns or to seek returns that are the inverse of a specific benchmark on a daily basis. They are designed to achieve their investments objectives on a daily basis. They are not intended to track the underlying index over periods longer than a single day. Due to the effect of daily compounding, performance over longer periods can differ significantly from the inverse of the underlying index. In volatile markets, an inverse ETF may lose money even if the underlying index decreases over time. Holding inverse ETFs for longer than one trading session increases risk due to the compounding of returns. As such, these investments are generally considered unsuitable for long-term holding. These products may not achieve their stated objectives. If the market rises, the inverse ETF will lose value, and you may lose a significant portion or all of your principal investment.

It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear.

ITEM 9: DISCIPLINARY INFORMATION

Registered Investment Advisors are required to disclose legal and disciplinary events that may be material to a *client's* or prospective *client's* evaluation of the Advisor's practice or the integrity of its management. The Advisor has responded to each item below:

A. A criminal or civil action in a domestic, foreign, or military court of competent jurisdiction in which your firm or a *management person*:

1. was convicted of or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses. 2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses. 3. was found to have been involved in a violation of an investment-related statute or regulation; or 4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

Neither the Advisor nor its management persons have any disclosure information to report for Item 9.A.1., Item 9.A.2, Item 9.A.3, and Item 9.A.4.

B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which your firm or a *management person*:

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or 2. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority (a) denying, suspending, or revoking the authorization of your firm or a *management person* to act in an *investment-related* business (b) barring or suspending your firm's or a *management person's* association with an *investment related* business (c) otherwise significantly limiting your firm's or a *management person's investment-related* activities; or (d) imposing a civil money penalty of more than \$2,500 on your firm or a *management person*.

Neither the Advisor nor its management persons have any information to report for Items 9.B.1 and 9.B.2(a-d).

C. A self-regulatory organization (SRO) proceeding in which your firm or a management person:

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or 2. was *found* to have been *involved* in a violation of the SRO's rules and was:(i) barred or suspended from membership or from association with other members or was expelled from membership; (ii) otherwise significantly limited from *investment-related* activities; or (iii) fined more than \$2,500.

Neither the Advisor nor its management persons have any information to report for Items 9.C.1 and 9.C.2.

Note: Individual information about The Advisor's management persons and investment advisor representatives is contained in their Form ADV Part 2B Brochures which are attached directly behind this firm Brochure. One investment advisor representative (Mr. Curley) has a reportable event from 1972 when he was a college student. If you did not receive these Brochures, please contact the Advisor via the contact information contained on the cover page of this Brochure.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. REGISTRATION AS A BROKER/DEALER OR BROKER/DEALER REPRESENTATIVE

The Advisor is not registered as a broker/dealer and no such registration is pending.

As disclosed at Item 10.C below, Adam Stalnaker, Joseph Kovach, and Michael Curley are separately registered as registered representatives of Private Client Services and in this capacity, they accept commissions for the sale of securities.

B. REGISTRATION AS A FUTURES COMMISSION MERCHANT, COMMODITY POOL OPERATOR OR A COMMODITY TRADING ADVISER

Neither the Advisor nor its Investment Advisor Representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor and no such registrations are pending.

C. REGISTRATION RELATIONSHIPS MATERIAL TO THIS ADVISORY BUSINESS AND CONFLICTS OF INTEREST

Neither the Advisor nor its Investment Advisor Representatives have any registration relationships, legal affiliations or any association with the following businesses that would present a possible conflict of interest and no such relationships are pending.

- ❖ broker-dealer, municipal securities dealer, government securities dealer or broker
- ❖ investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
- ❖ futures commission merchant, commodity pool operator or trading advisor
- ❖ banking or thrift institution

- ❖ lawyer or law firm
- ❖ insurance company or agency*
- ❖ pension consultant
- ❖ real estate broker or dealer
- ❖ sponsor or syndicator of limited partnerships.

The Advisor does not operate and does not have a material relationship with a hedge fund or other type of private pooled investment vehicle.

As disclosed at Items 5.E and 10.A of this Brochure, Adam Richard Stalnaker, Joseph J. Kovach and Michael A. Curley are separately engaged and dually registered as registered representatives of an unaffiliated broker/dealer (Private Client Services LLC) and receive commissions for securities transactions placed with this broker/dealer.

*Adam R. Stalnaker, Joseph J. Kovach, and Michael A. Curley are separately engaged as independently licensed insurance agents and receive normal commissions paid by insurance companies when clients purchase insurance through them.

Investment Advisor Representative, Andrew Smith, is the owner of an accounting firm and receives separate and customary payment for delivering any accounting related services. Some advisory clients may also be accounting clients of Mr. Smith. This creates a conflict in that Mr. Smith has an incentive to recommend his accounting firm to RWA clients and RWA to accounting clients. Clients are under no obligation to utilize Mr. Smith for any accounting services.

The Advisor is a fiduciary to each of its clients. The receipt of commissions by its registrants poses a conflict of interest between the Advisor and its clients. *Please refer to the important disclosure at Item 5.E of this Brochure as it addresses the conflicts of interest, The Advisor's fiduciary duty to its clients and how the conflicts are managed.*

D. SELECTION OF OTHER ADVISERS OR MANAGERS AND HOW THIS ADVISER IS COMPENSATED FOR THOSE SELECTIONS

As discussed at Item 4.B, the Advisor has entered into an agreement with Betterment, LLC ("Betterment") to utilize among other things, Betterment's software, advice, and digital services on a sub-advisory basis. This means the Advisor maintains its role as your primary investment adviser while utilizing the investment platform available through Betterment. The annual investment management fee charged to The Advisor's clients is 0.75% from which Betterment receives .25% as set forth in the client service agreement, as discussed in Item 5.A of this Brochure.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. CODE OF ETHICS

The Advisor takes the issues of fiduciary duty and regulatory compliance seriously and is committed to compliance with state and applicable federal securities laws. The Advisor has a position of public trust, and it is our goal to maintain that trust; provide excellent service, good investment performance; and advice that is suitable.

The Advisor places great value on ethical conduct. Therefore, the ultimate goal of our internal policies is to challenge our staff to live up not only to the letter of the law, but also to the ideals set forth by the Advisor. Clients may be familiar with the roles fiduciaries play in various legal situations and in certain industries. As a Registered Investment Advisor, the Advisor is a

fiduciary to each and every client. As fiduciaries, Registered Investment Advisors owe their clients several specific duties. In accordance with the SEC's Regulation Best Interest, an Investment Advisor's fiduciary duties include:

- Providing advice that is suitable based on information gathered from the client
- Providing full disclosure of material facts and potential conflicts of interest (such that the client has complete and accurate disclosure in order to make an informed decision about services of the Advisor and about investment recommendations)
- The utmost and exclusive loyalty and good faith
- Best execution of transactions under the available circumstances
- The Advisor's reasonable care to avoid ever misleading clients
- Only acting in the best interests of clients.

It is The Advisor's policy to protect the interests of each of our clients and to place clients' interests first and foremost. The Advisor will abide by honest and ethical business practices to include, but not limited to:

- The Advisor will not induce trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account.
- The Advisor will make investment decisions with reasonable grounds to believe that the decisions are suitable for the client on the basis of information furnished by the client and we will document suitability.
- The Advisor and its Investment Advisor Representatives will not borrow money from clients, nor will they lend money to clients.
- The Advisor will not recommend the purchase of a security without the reasonable belief that the security is registered, or the security or transaction is exempt from registration in states where we provide investment advice and based upon information the Advisor receives.
- The Advisor will not recommend that a client place an order to purchase or sell a security through a broker/dealer or agent, or engage the services of an unlicensed brokerage firm, based upon information available to the Advisor.
- The Advisor's Member and staff (if applicable) will report all required personal securities transactions to Thomas V. David, Chief Compliance Officer as required by securities rules and regulations. Reportable trades for the Advisor include all *but the following exceptions*:
 - ❖ Transactions effected pursuant to an automatic investment plan
 - ❖ Securities held in accounts over which the access person has no direct or indirect influence or control
 - ❖ Transactions/holdings in direct obligations of the US Government
 - ❖ Money market instruments — bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high- quality short-term debt instruments
 - ❖ Shares of money market funds
 - ❖ Transactions and holdings in shares of mutual funds, since the Advisor does not have a material relationship with an investment company
 - ❖ Transactions in units of a unit investment trust are not reportable if the UIT is invested exclusively in unaffiliated mutual funds.

All applicable securities rules and regulations will be strictly enforced. The Advisor will not permit and has instituted controls against insider trading. Investment Advisor Representatives

and administrative personnel who do not follow the Advisor's Code of Ethics or who in any way violate securities rules and regulations, or who fail to report known or suspected violations will be disciplined or terminated, depending upon severity. Such persons could also face action by the SEC and/or state securities regulators.

Clients are welcome to request a copy of the Advisor's Code of Ethics by contacting Rockport Wealth's office.

B. RECOMMENDATIONS INVOLVING MATERIAL FINANCIAL INTERESTS

The Advisor does not recommend that clients buy or sell any security in which any of The Advisor or its related persons have a material financial interest.

C. INVESTING PERSONAL MONIES IN THE SAME SECURITIES AS CLIENTS

The Advisor and/or individuals associated with the Advisor may have similar investment goals and objectives and as a result may buy or sell securities for their personal accounts that may be identical to or different from those recommended to clients. Thus, at times the interests of staff members' accounts may coincide with the interests of clients' accounts. However, at no time will the Advisor or its related persons receive an added benefit or advantage over clients with respect to these transactions nor will the Advisor or nor its staff ever place themselves in a position to have added benefit as a result of advice given to clients. The Advisor's Chief Compliance Officer monitors access persons' personal trading activities.

D. TRADING SECURITIES AT / AROUND THE SAME TIME AS CLIENTS

The Advisor acknowledges the Advisor's fiduciary responsibility to place the investment needs of clients ahead of the Advisor and its staff. The interests of clients are held in the highest regard. At no time will the Advisor or its personnel receive an added benefit or advantage over clients with respect to these transactions. The Advisor and its personnel will not place itself in a position to have added benefit as a result of advice given to clients. The Advisor and its personnel will not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. The Advisor has established trading policies for its access persons. The Advisor's Chief Compliance Officer is responsible for the monitoring of personal trading conducted by staff.

ITEM 12: BROKERAGE PRACTICES

A. FACTORS USED TO SELECT CUSTODIANS AND/OR BROKER/DEALERS

The Advisor is not a broker/dealer or custodian. In order to manage your assets, you will need to establish an account with a qualified custodian. Your custodian will take custody of your funds and securities.

The Advisor considers the full range and quality of a brokerage firm's services including, among other things, the value of services provided to clients, execution capability, services provided to the Advisor, commission rate and financial responsibility. In this light, the determinative factor is not necessarily the lowest possible commission costs but whether the selection offers the best qualitative execution for the supervised account.

The Advisor uses the brokerage and custodial services of Charles Schwab & Co. a FINRA registered broker-dealer and Member SIPC (or Schwab). We also recommend MTG, LLC dba "Betterment Securities", a FINRA registered broker-dealer and Member SIPC, as the qualified custodian for clients utilizing the Betterment investment platform. If clients engage in transactional business via Private Client Services, LLC, this firm clears through Pershing, LLC.

The Advisor recognizes its duty to recommend brokerage firms that execute securities transactions in such a manner that the clients' total costs or proceeds in each transaction are the most favorable under the circumstances. Recommendations are based on the reputation of the broker, quality and promptness of execution services and quality of account reporting, commission rates, creditworthiness, financial condition, and business reputation, customer service, reliability and professionalism, ability to access various market centers, and available technology. Ultimately, the client will have the final decision on brokerage selection.

The Advisor is independently owned and operated and is not affiliated with the recommended custodians. Our clients enter into an account agreement directly with their selected custodian. The Advisor does not maintain authority to open the account for you, although we may assist you with the paperwork, if requested. Your selected custodian holds your assets in a brokerage account and securities will be purchased or sold from your account(s) when we and/or you instruct them to do so.

The Advisor recognizes its duty to recommend brokerage firms that execute securities transactions in such a manner that the clients' total costs or proceeds in each transaction are the most favorable under the circumstances. Recommendations are based on the reputation of the broker, quality and promptness of execution services and quality of account reporting, commission rates, creditworthiness, financial condition, and business reputation, customer service, reliability and professionalism, ability to access various market centers, and available technology.

The Advisor monitors the recommended service provider's best execution documentation and anticipates that current execution information will also be provided on request. The recommended firms are large and sophisticated order senders. While it is possible that clients may pay higher commission or transactions fee through the recommended service providers, the Advisor has determined Schwab and Betterment Securities currently offer the best overall value to clients for the service, brokerage and technology provided.

For our clients' accounts that Betterment Securities maintains, Betterment Securities does not charge you separately for custody/brokerage services but is compensated as part of the Betterment for Advisors (defined below) platform fee, which is charged for a suite of platform services, including custody, brokerage, and sub-advisory services provided by Betterment and access to the Betterment for Advisors platform. The platform fee is an asset-based fee charged as a percentage of assets in your Betterment account. Clients utilizing the Betterment for Advisor's platform may pay a higher aggregate fee than if the investment management, brokerage, and other platform services are purchased separately. Nonetheless, for those clients participating in the Betterment for Advisors platform, we have determined that having Betterment Securities execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

For any investments in American Funds mutual funds, those will be held directly with the fund company. For Delaware Statutory Trusts, the Advisor will generally recommend the services of Inland Securities Corporation, Member FINRA/SIPC.

1. RESEARCH AND OTHER SOFT DOLLAR BENEFITS

The receipt of support services, investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest. The Advisor does not receive research and has not entered into soft dollar agreements with any of the recommended brokerage firms. Generally speaking, soft dollars are benefits (primarily investment research and brokerage services) that investment advisors may receive in exchange for directing trade activity to a particular brokerage firm.

SERVICES AVAILABLE TO THE ADVISOR

Our recommended custodians typically provide various support services which help us to manage or administer our clients' accounts, while others help us manage and grow our business. The Advisor may receive general research, business-related products and back-office administrative support services in addition to execution from its recommended broker/dealers in connection with client securities transactions. Therefore, we receive benefits from its selected custodial firms that it would not otherwise receive if it were not a Registered Investment Advisor. The Advisor and its clients may pay slightly more than the lowest rate of commissions available in order to obtain various administrative and research services. However, the Advisor has determined in good faith and after periodic (and ongoing) review, that the fees are reasonable in relation to the full range and quality of the brokerage, administrative and research services provided, viewed in terms of either particular transactions or the Advisor's overall responsibilities with respect to the accounts over which it exercises investment discretion. The determinative factor is whether transaction fees represent the best qualitative execution services for our managed accounts.

SERVICES THAT BENEFIT YOU

Services that benefit clients include access to a broad range of investment products, execution of securities transactions and custody of client assets. The investment products available through our recommended services provides may include some which we might not otherwise have access or that would require a significantly higher minimum investment by our clients. Our recommended relationships provide access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

Betterment for Advisors includes access to a globally diversified, low-cost portfolio of ETFs, execution of securities transactions, and custody of client assets through Betterment Securities. In addition, a series of model portfolios created by third-party providers are also available on the platform. Betterment Securities' services described in this paragraph generally benefit you and your account.

The Advisor can also expect to receive, without cost to the Advisor, computer software and related systems support, which allow the Advisor to better monitor client accounts maintained at the recommended custodian. The Advisor may receive the software and related support at a discount or without cost because the Advisor renders investment management services to clients that maintain assets at the recommended custodian(s). The software and related systems support may benefit the Advisor, but not its clients directly. Additionally, the Advisor may receive duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional advisor program participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information. These services assist the Advisor in coordinating its services with the custodial firms in a more efficient manner.

SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU

Our preferred custodians also make available other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may:

- Assist with back-office functions, recordkeeping, and client reporting of our clients' accounts.
- Provide access to client account data (such as duplicate trade confirmations and account statements).
- Provide pricing and other market data.

SERVICES THAT GENERALLY BENEFIT ONLY US

The Advisor may be offered other services intended to help us manage and further develop our business enterprise. These services include: Consulting (including through webinars) on

technology and business needs and access to publications and conferences on practice management and business succession.

The availability of services from our preferred custodians benefit us because we do not have to produce or purchase them. In addition, we do not have to pay for Betterment Securities' services. However, certain services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody, in which case, such arrangements will be disclosed when it is applicable. We may have an incentive to recommend that you maintain your account with our recommended custodian or Betterment Securities, based on our interest in receiving services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions and this presents a conflict of interest with our clients. We believe, however, that our selection of service providers is in the best interests of our clients. (Our selection is primarily supported by data discussed at Item 12.A of this Brochure).

In fulfilling its duties to its clients, the Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the Advisor's receipt of economic benefits from a broker-dealer or other service provider(s) creates a conflict of interest since these benefits may influence the Advisor's choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services

BETTERMENT FOR ADVISORS' TRADING POLICY

When using the Betterment for Advisors platform, we and you are subject to the trading policies and procedures established by Betterment. These policies and procedures limit our ability to control, among other things, the timing of the execution of certain trades (including in response to withdrawals, deposits, or asset allocation changes) within your account.

You should not expect that trading on Betterment is instant, and, accordingly, you should be aware that Betterment does not permit you or us to control the specific time during a day that securities are bought or sold in your account (i.e., to "time the market"). Betterment describes its trading policies in Betterment LLC's Form ADV Part 2A. As detailed in that document, Betterment generally trades on the same business day as it receives instructions from you or us. However, transactions will be subject to processing delays in certain circumstances. In particular, orders initiated on non-business days and after markets close generally will not transact until the next business day. Betterment also maintains a general approach of not placing securities orders during approximately the first thirty minutes after the opening of any market session. Betterment also generally stops placing orders arising from allocation changes in existing portfolios approximately thirty minutes before the close of any market session. Betterment continues placing orders associated with deposit and withdrawal requests until market close. Betterment maintains a general approach of not placing orders around the time of scheduled Federal Reserve interest rate announcements. Furthermore, Betterment may delay or manage trading in response to market instability. For further information, please consult Betterment LLC's Form ADV Part 2A.

2. BROKERAGE FOR CLIENT REFERRALS

The Advisor does not receive referrals from a broker/dealer or third party in exchange for using that broker/dealer or third party.

3. CLIENTS DIRECTING BROKER/DEALER / CUSTODIAN SELECTIONS

We do not accept directed brokerage for investment management clients. We primarily use Schwab as our custodian.

Financial Planning only clients are welcome to utilize their preferred service provider and are welcome to implement recommendations in whole or in part, entirely at their discretion. In such cases, the client will negotiate terms and arrangements for their account(s) with their service

provider. The client may pay higher or lower commissions or costs or receive less favorable net pricing than may otherwise be available.

B. AGGREGATION AND (BLOCK) TRADING FOR MULTIPLE CLIENT ACCOUNTS

We can elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when RWA believes such action can prove advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

RWA uses the average price allocation method for transaction allocation. Under this procedure RWA will calculate the average price and transaction charges for each transaction included in a block order and assign the average price and transaction charge to each allocated transaction executed for the client's account.

Any clients utilizing the investment platform offered through Betterment, should refer to the Betterment Form ADV 2A Brochure for the platform's trading policies.

ITEM 13: REVIEW OF ACCOUNTS

A. FREQUENCY AND NATURE OF PERIODIC REVIEWS AND WHO CONDUCTS

Hourly or project-based financial planning services do not involve ongoing services or reviews. Rockport Wealth's ongoing planning services include:

- ✓ Quarterly check-ins with our client to assess the financial plan, implementation of the plan, limitations, adjustments needed and assess new variables in a client's financial picture.
- ✓ Year-end review and discussion pertaining to the plan and identifying necessary updates based on input from our client
- ✓ A new/updated financial plan annually

Investment Management Services involve frequent monitoring of portfolios. Portfolios are reviewed no less than quarterly and underlying securities are generally reviewed daily. Reviews are performed by the Advisor's owners and its Investment Advisor Representatives. Portfolios are analyzed in relation to the client's stated investment objectives, risk profile, tax situation and market conditions.

Individual client reviews are conducted no less than annually in order to provide the client with the opportunity to review their profile data and investment strategies. Investment Advisor Representatives conduct periodic client meetings and have frequent telephonic contacts in which investment objectives, market conditions and other factors are discussed with clients.

Clients are welcome to initiate meetings (telephonically, electronically or in person) throughout the year. However, clients are obligated to promptly contact the Advisor when there exists a real or potential change in the clients' financial condition or if a change in strategy may be contemplated. This prompt notification gives the Advisor the opportunity to review the clients' new information and determine if it impacts the advice and recommendations prepared for the client.

B. FACTORS THAT MAY TRIGGER NON-PERIODIC REVIEWS OF ACCOUNTS

Additional reviews may be triggered by material market, economic or political events or in conjunction with significant deposits or withdrawals. Reviews may also occur as a result of reported changes in the client's financial situation (which may include but are not limited to: Termination of employment, a change in the family dynamic, relocation, inheritance, or retirement).

C. CONTENT AND FREQUENCY OF REGULAR REPORTS PROVIDED

Clients can expect to receive confirmation statements from all transactions and a monthly/quarterly statement, directly from their custodial firm. The custodian's quarterly reports detail account value, net change, portfolio holdings, and all account activity.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. ECONOMIC BENEFITS PROVIDED BY THIRD PARTIES FOR ADVICE RENDERED TO CLIENTS (INCLUDES SALES AWARDS OR OTHER PRIZES)

The Advisor does not receive any economic benefit, directly or indirectly from any third party in connection with advisory services provided to its clients.

B. COMPENSATION TO NON-ADVISORY PERSONNEL FOR REFERRALS

The Advisor may contract unaffiliated persons or firms to act as solicitors and as such they may refer prospective clients. The compensation may involve a one-time or ongoing fee. The terms of services and compensation paid by the Advisor to its solicitors are established in an agreement between the Advisor and the solicitor. The solicitor compensation arrangement is disclosed to prospective clients at the time of the referral via a compensation disclosure document presented by the solicitor along with the Advisor's Form ADV 2 Brochure, as required by securities rules which govern referral activities. There is a conflict of interest that exists between the solicitor and Advisor clients since the solicitor receives the referral-based compensation from the Advisor when a prospective client engages the Advisor for advisory services and in most cases, for so long as the client agreement continues. It is important to understand that The Advisor's compensation arrangements with contracted solicitors to market the Advisor's services do not impact the fees our clients pay to the Advisor for advisory services.

The Advisor receives non-economic benefits from Betterment for Advisors and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described in Item 12 of this Brochure. The availability to us of Betterment for Advisors' and Betterment Securities products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

ITEM 15: CUSTODY

The Advisor does not accept custody of client funds or securities. Your selected custodian maintains actual custody of your assets. The Advisor's clients have a direct and beneficial interest in their securities (individual ownership), rather than an undivided interest in a pool of securities.

The Advisor deducts its contractually agreed investment management fees from clients' custodial accounts with client authorization. Advisers are deemed to have constructive custody when fees are deducted directly from custodial accounts. However, the Advisor is not subject to custody reporting requirements because the Advisor deducts fees via qualified custodians and clients receive account statements directly from the custodian which reflect account deductions. Clients should carefully review those statements promptly and report any questions, concerns, or absence of statements to the Advisor and their custodial firm.

The Advisor does not charge fees of \$1200 or more for services to be performed six or more months in advance of services.

ITEM 16: INVESTMENT DISCRETION

With the client's authorization as provided in the custodial account forms and the Advisor's client agreement, the Advisor will maintain limited discretionary trading authority to execute securities transactions in the investor's portfolio within investor's designated investment objectives, to include the securities to be bought and sold, and the amount of securities to be bought and sold. The Advisor will not hold full power of attorney, nor will the Advisor ever have authority to withdraw funds or to take custody of investor funds or securities other than the ability to deduct contractually agreed advisory fees via investor's qualified custodian with the client's authorization. Investment Management clients may establish reasonable written directives to invest in limited amounts of securities and/or refrain from investing in particular industries.

ITEM 17: VOTING CLIENT SECURITIES (PROXIES)

As a matter of policy and practice, RWA will not vote proxies on behalf of clients. Clients will retain voting authority and can expect to receive voting materials directly from their custodian.

The Advisor is available to assist clients with questions and concerns relating to proxies. The Advisor does not engage in proxy-related discussions with non-clients and does not solicit proxies

Deviations from these policies will result in a prompt amendment of this Form ADV 2A Brochure and may require the Advisor to comply with SEC Proxy Registration Rules.

ITEM 18: FINANCIAL INFORMATION

A. BALANCE SHEET

The Advisor does not accept fees for services that involve \$500 or more for services to be performed six or more months in advance. The Advisor does not maintain custody of client funds and securities and therefore is not required to include a balance sheet with this Brochure.

B. FINANCIAL CONDITIONS REASONABLY LIKELY TO IMPAIR THE ADVISER'S ABILITY TO MEET CONTRACTUAL COMMITMENTS TO CLIENTS

Neither the Advisor nor its management have a financial condition that is reasonably likely to impair the Advisor's ability to meet contractual commitments to clients. In light of the recent COVID-19 pandemic, as a precautionary measure, the entities that own the Advisor applied for and received a potentially waivable Paycheck Protection Program loan. The decision to apply for the PPP loan was based upon future uncertainty and volatility in the financial markets. Further, consideration was given to the potential of long-term financial stress and the

potential for having to hire temporary professional staff in the event Rockport Wealth's team succumbed to COVID-19 or complications arising from the disease.

C. BANKRUPTCY PETITIONS IN PREVIOUS TEN YEARS

The Advisor, its owners and its investment adviser representatives have not been party to a bankruptcy petition during the previous 10 years.

PRIVACY POLICY

The Advisor is covered under the definition of a “financial institution” as defined by the Federal Gramm-Leach-Bliley Act (the “Act”). The Advisor is therefore subject to Act and the privacy rules established by the SEC (Regulation S-P known as the “Privacy Rule”).

Privacy and the protection of nonpublic personal information is an issue that the staff of The Advisor takes seriously. In compliance with privacy rules, The Advisor has adopted policies and procedures reasonably designed to safeguard client and consumer records and information.

In its role as Investment Advisor, the Advisor routinely collects nonpublic personal information from clients and prospective clients. This information generally will include but is not limited to:

- Information provided in applications, forms and other data provided to us either verbally or in writing, and include but are not limited to your name, address, phone number, account information, social security number, assets, employment, income and debt, email address, etc.
- Information about your transactions, accounts, trading activity and parties to transactions; health and beneficiary information (such as may pertain to investment planning issues)
- Information from other outside sources and any other data that is deemed to be nonpublic personal information as defined by the Act and state privacy rules.

The Advisor values our clients’ trust and confidence. We will never sell our client’s nonpublic personal information. All information provided by clients or prospective clients to the Advisor, (including the Advisor’s personnel), and information and advice furnished by the Advisor to clients, shall be treated as confidential and shall not be disclosed to unaffiliated third parties, except as directed by clients with written authorization, by application to facilitate the investment advisory services offered by the Advisor via an unaffiliated financial services provider (such as Betterment and the client’s custodial firm or an unaffiliated broker/dealer), or as required by any rule, regulation, or law to which the Advisor or its staff may be subject.

The Advisor maintains client’s records in a controlled environment and records (electronic and otherwise) are only available to authorized persons of the Advisor who have a need to access client information in order to deliver advisory services, provide administrative support, or to respond to client requests. The Advisor has made reasonable efforts and conducts periodic tests to ensure that its electronic workstations are secure.

The Advisor’s position on protecting non-public personal information extends beyond the life of the client agreement. Client information is retained in a protected manner for the time period required by regulators (five years from the date of last use) and thereafter is safely destroyed via electronic means or via in-house shredding.

Consumers (who are not clients) who provide information during an initial consultation or for other purposes but do not go on to become clients of the Advisor also receive privacy protection. Original information will be promptly returned in person. Alternatively, if nonpublic personal information is contained in copies of documents, notes or some other media, this information will be securely filed for a period of up to one year (depending upon likelihood of engagement) before being shredded in-house.

Clients are encouraged to discuss any questions regarding The Advisor’s privacy policies and procedures with the Chief Compliance Officer.

ROCKPORT WEALTH, LLC
doing business as
“Rockport Wealth Advisors”

FORM ADV 2A, APPENDIX 1
WRAP FEE PROGRAM BROCHURE

This wrap fee program Brochure provides information about the qualifications and business practices of Rockport Wealth, LLC (doing business as “Rockport Wealth Advisors”). If you have any questions about the contents of this Brochure, please contact us (216) 226-4560 or via email to compliance@rockportwealth.com.

The information in this Brochure has not been approved or verified by or the United States Securities and Exchange Commission (“SEC”) or any state securities regulator. Registration does not imply a certain level of skill or training. Additional information about Rockport Wealth is available on the SEC’s Advisor Search website at www.adviserinfo.sec.gov.

Rockport Wealth’s CRD number is: 297122

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June 1, 2026

ITEM 2: MATERIAL CHANGES

Rockport Wealth, LLC, dba “Rockport Wealth Advisors” (hereinafter referred to as the “**Advisor**”) has the following material changes to report since its last annual amendment to this Brochure filed March 23, 2026:

Item 4: Services, Fees, and Compensation

Under the **Fees** and **Termination of Services** sections, we removed references to legacy contract fees and billing arrangements as all accounts are in the process of being moved to monthly, advanced billing utilizing the fee schedule as stated in this section.

Item 6: Portfolio Manager Selection and Evaluation

Under the **Voting Client Securities (Proxies)** section, we removed any references to our proxy voting procedures as the firm no longer votes proxies on behalf of clients.

The following amendments have additionally been made within the past year:

Item 4: Services, Fees, and Compensation

The following information was added to the **Services** section regarding the purchase of J Arnold Wealth Management:

In February of 2024, RWA purchased another registered investment advisor firm, J Arnold Wealth Management (“JAWM”). As of that date, the owner of JAWM, Jon Arnold, had no ownership role in RWA. A conflict of interest existed because a portion of the compensation paid to Mr. Arnold for the sale of his firm was dependent upon whether a significant number of the assets under management by JAWM transferring to RWA as part of the purchase. Mr. Arnold was to continue to work with RWA as an Investment Advisor Representative under RWA’s supervision and as a consultant with RWA, participating in the Investment Committee alongside Joseph Kovach and Adam Stalnaker.

Later, it was discovered that JAWM’s Form ADV Part 2A and Investment Management Agreement stated that fees would be charged according to total assets under management by household rather than by account. As part of our standard onboarding and account transition process, we may review certain historical account records relating to advisory services previously provided by another investment adviser. Based solely on the documentation made available to us, the fee calculations reflected in those records may not correspond in all respects with the billing methodology described in the applicable written advisory agreement between the client and the prior adviser.

Our firm was not involved in the prior adviser’s fee calculation or billing processes and did not supervise or oversee such activities. Our review is limited in scope and is not conducted as an audit, verification, or comprehensive analysis of the prior adviser’s records or practices. Accordingly, we make no representation regarding the accuracy, completeness, or appropriateness of any prior fee calculations.

Clients with questions regarding historical advisory fees should contact the prior investment adviser directly for clarification regarding the billing methodology applied.

This disclosure is provided for informational and transparency purposes only.

Mr. Arnold is no longer an Investment Advisor Representative of RWA, but he does currently act as a promoter of the firm.

Also, as Jon Arnold is no longer affiliated as an Investment Advisor Representative of Rockport Wealth Advisors, all references to J Arnold Wealth Management and Jon Arnold have been removed from this Brochure.

The following clarification was also added to the **Services** section regarding the treatment of billing and fees incurred for private placements not recommended by Rockport Wealth Advisors:

RWA will not hold outside private placements not recommended by the firm; RWA will assist in the facilitation of redemptions of these assets as needed and upon client request. For any legacy private placements not recommended by the Advisor but being held by RWA, these assets are not included in the wrap program. The Advisor will not bill the client on these assets, and the client is responsible for the alternative asset maintenance fee.

The following information regarding RWA's Strategic Models was added to the Services section:

Strategic Models

Certain RWA investment management services, referred to as the Strategic Models, provide for an alternative management style. The designed strategy utilized may involve certain investments being held for short terms. This approach is similar to a short-term market timing strategy and is not appropriate for every type of investor. It is also unlike a typical "style-box" strategy that remains fully invested in all market environments regardless of the risk/reward potential. The asset allocation model determines the percentage of assets that are appropriate to invest in equities, exchange traded funds ("ETFs"), bonds and cash and/or fixed income at any given time. From time to time, these management strategies may result in over-weighted positions in particular market sectors and/or industries, which can be more volatile and/or underperform relative to the market as a whole. *Please refer to Item 8.A of this Brochure for further investment strategy information.*

The strategy of the Strategic Models is limited to the types of investments noted in the previous page. While the firm attempts to accommodate certain reasonable investment restrictions such as amounts invested in the types of investments, the other investment strategies available through RWA may be more appropriate for investors who would prefer an alternative to a more active risk on - risk off strategy with limited classes of investments.

Performance results for this investment style are best analyzed over a market cycle due to the fact that the strategies may not correlate to the broader market. As with most investment strategies, it may be possible that the value of a managed account may depreciate in value over periods of time when the overall market may (be up) (appreciate in value). The strategies seek to obtain consistent returns in a bull or bear market. There is no assurance that a model's goal will be realized. Obviously long-term or choppy markets can persist. As at Item 8 of this Brochure, no investment strategy can guarantee profits, and all investors must be prepared for an investment loss.

Investors should not expect to be fully invested at all times, as these strategies maintain the ability to move into money market or defensive positions either partially or fully (such as fixed income or money market funds). When in a money market, the investor loses the potential for market appreciation within the account. Further, after the application of advisory fees, the account will lose value. If during the engagement a client directs the Advisor to move all or a portion of assets into a money market fund, the Advisor takes no responsibility on timing the move out or back into the designed investment strategy as the client is electing to self-direct the account during that time.

Frequent trading may impact investment performance and tax implications. Investors should consult with their personal tax adviser in connection with securities transactions and/or any particular investment(s) held in their account(s).

These strategies may not be appropriate for every type of investor. The strategies may deploy short-term trading strategies in an effort to capitalize on shorter-term market moves and as a result, a higher number of transactions may occur over a relatively short period of time. More transactions could result in higher fees in individual accounts which is why the Advisor's wrap fee program is utilized, as discussed below and at Item 5 of this Brochure. Some mutual funds / fund families impose redemption charges on funds held for less than the required minimum period, as determined by the fund (ref. prospectus). While best efforts are made to avoid these charges, clients may incur them from time.

The following was updated in the Fees section, disclosing the fee schedule for all new accounts, updating information regarding how fees are charged, and clarifying agreement termination requirements.

The Advisor's Program fees are calculated as a percentage of assets under management by household and combines portfolio management, commissions, trade execution costs, custody and other standard brokerage services within a single investment management fee. The fee does not include separate administrative costs that may be charged by sponsors of mutual funds or excluded funds held in the account. **The agreed upon annual fee is negotiable**, based on the nature, complexity, and scope of services as well as the amount and nature of assets to be managed, pre-existing relationships, and other factors, at the discretion of the Advisor as follows:

Account Value	Standard Fee Schedule
\$0 - \$500,000	1.25%
\$500,001 and above	1.00% or negotiable
<i>All fees are negotiable</i>	

The fees are charged based on a flat percentage using total account value (including cash and cash equivalent positions such as money market funds), as opposed to a tiered rate. The account value will be based upon the total value of all accounts attributable to the same household, so the same fee rate will be applied to each of those accounts. Different accounts within a household may have a different fee structure based on the assets involved. The agreed upon fee schedule and cadence will be established in the Advisor's Client Agreement.

For all new accounts, fees are paid monthly in advance, except for the initial month which is billed pro rata in arrears.

RWA has had different fee schedules in place in the past and, as stated above, our fees are negotiable at our discretion, which means that not all RWA clients are paying the same fees. Should moving to the fee schedule stated above lower your fees, we will automatically move you to the new, lower fee schedule. However, if moving to the above listed fee schedule would raise your fees, your legacy agreed upon fee will remain in place; if your fee was a negotiated fixed rate, your legacy agreed upon fee will remain in place. Please refer to your Client Agreement or reach out to RWA if you are unsure as to your agreed upon fee schedule. Your fees are paid monthly and according to the payment timing (arrears or advance) as specified in your Client Agreement.

The investment management fee may be revised during the engagement, particularly if different needs and/or complexities arise, or the scope of services should change. In such cases, the Advisor will notify the client of its intention to modify the fee with at least 30 days' written notice. Should the client decide not to accept the amended fee terms, the client is welcome to terminate services with 5 days' written notice prior to the effective date of the fee modification.

Item 5: Account Requirements and Types of Clients

This section was updated to the following:

The Advisor offers investment advisory services to individuals and high net worth individuals.

The suggested account minimum for investment management services is \$250,000 but can be negotiated based upon individual circumstances.

A client seeking performance-based services, as discussed at Item 5.A of this brochure, must meet the definition of a qualified client as established by the United States Securities and Exchange Commission (assets under the Advisor's management of at least \$1,100,000, or a minimum liquid net worth of \$2,200,000).

Item 6: Portfolio Manager Selection and Evaluation

The following risks were added to the section:

Fixed Income Risk: Fixed income securities are subject to the risk of the issuer's or a guarantor's inability to meet principal and interest payments on its obligations and to price volatility. Fixed-income securities are generally subject to the following risks:

- Interest Rate Risk. The value of investments in fixed-income securities will change based on changes in interest rates. If interest rates increase, the value of these investments generally declines. Securities with greater interest rate sensitivity and longer maturities generally are subject to greater fluctuations in value.
- Extension Risk. If interest rates rise, repayments of principal on certain fixed-income securities may occur at a slower-than-expected rate and, as a result, the expected maturity of such securities could lengthen which could cause their value to decline.
- Credit Risk. Fixed income investments are subject to the risk that issuers and/or counterparties will fail to make payments when they are due or default completely. Prices of the investments may be adversely affected if any of the issuers or counterparties are subject to an actual or perceived deterioration in their credit quality. Credit spreads may increase, which may reduce the market values of fixed income securities. Credit spread risk is the risk that economic and

market conditions or any actual or perceived credit deterioration may lead to an increase in the credit spread (i.e., the difference in yield between two securities of similar maturity but different credit quality) and a decline in price of the issuer's securities.

- **Prepayment Risk.** Issuers of certain fixed income securities may be able to prepay principal due on these securities, particularly during periods of declining interest rates, and Villere may have to invest the proceeds in lower-yielding securities.

Large-Sized Companies Risk: Larger, more established companies may be unable to respond quickly to new competitive challenges like changes in consumer tastes or innovative smaller competitors. In addition, large-cap companies are sometimes unable to attain the high growth rates of successful, smaller companies, especially during extended periods of economic expansion.

Market Capitalization Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium-cap companies may face a greater risk of business failure, which could increase the volatility of the clients' portfolios.

Small- and Medium-Sized Companies Risk: Investing in securities of smaller companies including micro-cap, small-cap, medium-cap and less seasoned companies often involve greater volatility than investing in larger, more established companies and these securities may be less liquid than other securities.

Sector/Industry Risk: In connection with Jon Arnold's management strategy, from time to time, client portfolios may have overweighted positions in particular market sectors and/or industries, which can be more volatile and/or underperform relative to the market as a whole.

Tax Considerations: The Advisor's strategies and investments can have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Unaffiliated Money Managers: If a portion of your assets is managed by a third-party money manager (such as Betterment), we will not determine the investments to be made for your account, but we will monitor the investments in the accounts and advise you on those holdings for so long as we are providing investment management services.

Delaware Statutory Trusts. These investments have a unique set of risks and are only appropriate for accredited investors. Risks may include but are not limited to: Illiquidity risk (investment must be held for an extended period of time), loss of control (no decision making over property, sponsor controls management and selling of property), regulatory risk (change in tax rules which could result in tax liabilities), execution risk (operator competence) and economic risk. There can be no assurance that a property will perform as projected and Delaware Statutory Trusts are subject to economic volatility, tenants not paying their rent as expected, and other traditional risks of owning, selling, and operating real estate. The fees and expenses of each offering should be carefully evaluated. Multiple owner offerings typically have additional expenses versus owning real estate on your own and these fees should be weighed against specific capital gains tax liability. All investors are encouraged to have their tax and legal counsel advise them on taxes including any federal and state

capital gains taxes, depreciation recapture and any other tax issues, which could be applicable.

Covered Call Options. While this strategy can provide income, it limits your ability to participate in any increase in the price of the underlying security above the strike price. Furthermore, a covered call strategy does not eliminate the risk of market-based losses on the underlying stock. In fact, if the stock price declines, the premium received from the option may not be sufficient to offset the loss in the value of the underlying security. Additionally, the option can be exercised at any time, requiring you to sell the underlying security at the strike price, potentially below the market price. Market conditions can negatively impact option values or the ability to close positions favorably and the forced sale of shares upon assignment may trigger taxable events.

Inverse ETFs. This strategy is used to hedge client portfolios against market downturns or to seek returns that are the inverse of a specific benchmark on a daily basis. They are designed to achieve their investments objectives on a daily basis. They are not intended to track the underlying index over periods longer than a single day. Due to the effect of daily compounding, performance over longer periods can differ significantly from the inverse of the underlying index. In volatile markets, an inverse ETF may lose money even if the underlying index decreases over time. Holding inverse ETFs for longer than one trading session increases risk due to the compounding of returns. As such, these investments are generally considered unsuitable for long-term holding. These products may not achieve their stated objectives. If the market rises, the inverse ETF will lose value, and you may lose a significant portion or all of your principal investment.

The following update was made regarding the Advisor's proxy voting policy:

As a matter of policy and practice, RWA will not vote proxies on behalf of clients. Clients will retain voting authority and can expect to receive voting materials directly from their custodian.

The Advisor is available to assist clients with questions and concerns relating to proxies. The Advisor does not engage in proxy-related discussions with non-clients and does not solicit proxies.

Item 9 Additional Information

The Other Financial Industry Affiliations section was updated to reflect the following:

Investment Advisor Representative, Andrew Smith, is the owner of an accounting firm and receives separate and customary payment for delivering any accounting related services. Some advisory clients may also be accounting clients of Mr. Smith. This creates a conflict in that Mr. Smith has an incentive to recommend his accounting firm to RWA clients and RWA to accounting clients. Clients are under no obligation to utilize Mr. Smith for any accounting services.

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ITEM 4: SERVICES, FEES, AND COMPENSATION

Services

Rockport Wealth, LLC, dba “Rockport Wealth Advisors” (hereinafter referred to as the “**Advisor**”) offers The Rockport Wealth Wrap Fee Program. (the “**Program**”). The Program combines a portfolio management fee as well as commission and trade execution costs within a single, bundled fee.

In February of 2024, RWA purchased another registered investment advisor firm, J Arnold Wealth Management (“JAWM”). As of that date, the owner of JAWM, Jon Arnold, had no ownership role in RWA. A conflict of interest existed because a portion of the compensation paid to Mr. Arnold for the sale of his firm was dependent upon whether a significant number of the assets under management by JAWM transferring to RWA as part of the purchase. Mr. Arnold was to continue to work with RWA as an Investment Advisor Representative under RWA’s supervision and as a consultant with RWA, participating in the Investment Committee alongside Joseph Kovach and Adam Stalaker.

Later, it was discovered that JAWM’s Form ADV Part 2A and Investment Management Agreement stated that fees would be charged according to total assets under management by household rather than by account. As part of our standard onboarding and account transition process, we may review certain historical account records relating to advisory services previously provided by another investment adviser. Based solely on the documentation made available to us, the fee calculations reflected in those records may not correspond in all respects with the billing methodology described in the applicable written advisory agreement between the client and the prior adviser.

Our firm was not involved in the prior adviser’s fee calculation or billing processes and did not supervise or oversee such activities. Our review is limited in scope and is not conducted as an audit, verification, or comprehensive analysis of the prior adviser’s records or practices. Accordingly, we make no representation regarding the accuracy, completeness, or appropriateness of any prior fee calculations.

Clients with questions regarding historical advisory fees should contact the prior investment adviser directly for clarification regarding the billing methodology applied.

This disclosure is provided for informational and transparency purposes only.

Mr. Arnold is no longer an Investment Advisor Representative of RWA, but he does currently act as a promoter of the firm.

In addition to “Advisor”, you will see the term, “Investment Advisor Representatives” used in this Brochure. This term refers to those persons who are appropriately registered and authorized by the Advisor to deliver investment advisory services on behalf of the Advisor.

The Advisor, as the Program’s manager, together with its investment adviser representatives, are responsible for research, security selection, and implementation of transaction orders in the Client’s account. The Advisor receives a portion of the Program fee for its services.

The transactions in the Client’s account will be executed by and custodied at Charles Schwab & Co., Inc., a FINRA registered broker-dealer and Member SIPC. The Program pays Charles Schwab & Co., Inc, a portion of its fee for commissions and trade execution expenses.

The Program’s investment management services are ongoing in nature, focus solely on portfolio management, and include financial planning services. This service does not include consultation services outside the scope of the managed investments. Investment management services are ongoing until terminated in writing by either party. Services are provided under this wrap fee program, which provides for portfolio management fees for all

assets including private placements recommended by the Advisor as well as commission, trade executions costs, custody, and other standard brokerage services within a single, bundled fee.

RWA will not hold outside private placements not recommended by the firm; RWA will assist in the facilitation of redemptions of these assets as needed and upon client request. For any legacy private placements not recommended by the Advisor but being held by RWA, these assets are not included in the wrap program. The Advisor will not bill the client on these assets, and the client is responsible for the alternative asset maintenance fee.

Program services begin only after the Client and Advisor formalize the relationship with a properly executed client agreement. After the formal engagement and depending upon the scope of the engagement, the Advisor and client will share in a data gathering and discovery process in an effort to determine the client's stated needs, goals, intentions, time horizons, risk tolerance and investment objectives, based upon information provided by the client and the nature of services requested. The Advisor and its client will normally complete a risk assessment, investment policy statement ("IPS") or similar document, depending upon the scope of services to be provided.

After an analysis and data-gathering process and depending upon the nature of services requested, The Advisor may prepare reviews, analysis, asset allocation recommendations, and may recommend specific investments. The Advisor utilizes the information provided by the client to prepare portfolio recommendations or adjustments in an existing portfolio. The Advisor can tailor services as desired by the client, however where Investment Management Services or information are limited, clients must understand that comprehensive investment needs and or objectives may not be fully considered due to the client's option not to receive limited services, the lack of information received, and/or client disclosure.

As the Program's Manager, the Advisor is responsible for the research, security selection and implementation of transactions in clients' accounts. Recommended investments will normally include (as appropriate for each client's stated situation): exchange traded index funds, mutual funds, other similar equity related index funds, stocks, bonds, real estate investment trusts, master limited partnerships, money market funds, U.S. treasury funds, cash sweep accounts, covered calls, inverse ETF derivatives and other liquid cash and cash-like vehicles. Please refer to Item 6 of this Brochure for additional information.

Strategic Models

Certain RWA investment management services, referred to as the Strategic Models, provide an alternative management style. The designed strategy utilized may involve certain investments being held for short terms. This approach is similar to a short-term market timing strategy and is not appropriate for every type of investor. It is also unlike a typical "style-box" strategy that remains fully invested in all market environments regardless of the risk/reward potential. The asset allocation model determines the percentage of assets that are appropriate to invest in equities, exchange traded funds ("ETFs"), bonds and cash and/or fixed income at any given time. From time to time, these management strategies may result in over-weighted positions in particular market sectors and/or industries, which can be more volatile and/or underperform relative to the market as a whole. *Please refer to Item 8.A of this Brochure for further investment strategy information.*

The strategy of the Strategic Models is limited to the types of investments noted in the previous page. While the firm attempts to accommodate certain reasonable investment restrictions such as amounts invested in the types of investments, the other investment strategies available through RWA may be more appropriate for investors who would prefer an alternative to a more active risk on - risk off strategy with limited classes of investments.

Performance results for this investment style are best analyzed over a market cycle due to the fact that the strategies may not correlate to the broader market. As with most investment

strategies, it may be possible that the value of a managed account may depreciate in value over periods of time when the overall market may (be up) (appreciate in value). The strategies seek to obtain consistent returns in a bull or bear market. There is no assurance that a model's goal will be realized. Obviously long-term or choppy markets can persist. As at Item 8 of this Brochure, no investment strategy can guarantee profits, and all investors must be prepared for an investment loss.

Investors should not expect to be fully invested at all times, as these strategies maintain the ability to move into money market or defensive positions either partially or fully (such as fixed income or money market funds). When in a money market, the investor loses the potential for market appreciation within the account. Further, after the application of advisory fees, the account will lose value. If during the engagement a client directs the Advisor to move all or a portion of assets into a money market fund, the Advisor takes no responsibility on timing the move out or back into the designed investment strategy as the client is electing to self-direct the account during that time.

Frequent trading may impact investment performance and tax implications. Investors should consult with their personal tax adviser in connection with securities transactions and/or any particular investment(s) held in their account(s).

These strategies may not be appropriate for every type of investor. The strategies may deploy short-term trading strategies in an effort to capitalize on shorter-term market moves and as a result, a higher number of transactions may occur over a relatively short period of time. More transactions could result in higher fees in individual accounts which is why the Advisor's wrap fee program is utilized, as discussed below and at Item 5 of this Brochure. Some mutual funds / fund families impose redemption charges on funds held for less than the required minimum period, as determined by the fund (ref. prospectus). While best efforts are made to avoid these charges, clients may incur them from time.

Limited Discretion

With the client's authorization as provided in the custodial account forms and the Advisor's client agreement, the Advisor will maintain limited discretionary trading authority to execute securities transactions in the investor's portfolio within investor's designated investment objectives, to include the securities to be bought and sold, and the amount of securities to be bought and sold. The Advisor will not hold full power of attorney, nor will the Advisor ever have authority to withdraw funds or to take custody of investor funds or securities other than the ability to deduct contractually agreed advisory fees via the client's account held at Charles Schwab & Co., Inc., with the client's authorization.

Client Tailored Services and Client Imposed Restrictions

The Advisor focuses on providing individualized services. The Advisor can tailor services to focus only on certain portfolio components, depending upon the client's wishes and/or the nature of the engagement. However, where client services or information are limited, clients must understand that comprehensive investment needs and objectives may not be fully considered due to the client's option to receive limited services, the lack of information received, and/or client disclosure. The Advisor and the client will share in a data gathering and discovery process in an effort to determine the client's stated needs, goals, intentions, time horizons, risk tolerance and investment objectives, based upon information provided by the client and the nature of services requested. The client and Advisor may complete a risk assessment, investment policy statement ("IPS") or similar documentation, depending upon the nature of services to be provided.

Clients may impose reasonable restrictions pertaining to certain securities or types of securities in accordance with their values or beliefs and such instructions will be agreed to in writing between the client and the Advisor. The ongoing Investment Management Services provided are based upon the client's stated individual needs and objectives.

Ongoing Services

Throughout its engagement, the Advisor will remain available for consultations pertaining to the managed portfolio. The Advisor will provide ongoing monitoring of the portfolio in accordance with the directives provided. The underlying portfolio assets will be reviewed internally on a frequent basis (often daily), the client's portfolio will be internally reviewed no less than annually, but reviews may occur more frequently, depending upon the types of investments, market conditions, when the client reports (actual or potential) changes in their financial condition, at the discretion of the Advisor, and in conjunction with significant deposits or withdrawals. The review process is discussed in Item 8 of this Brochure.

Clients must play an active role. The Advisor requires its client to participate in the formation of the investment plan, the development of investment advice and recommendations and the ongoing services provided. Clients may call the office during regular business hours to discuss their portfolio or ask questions, but the Advisor recommends that clients initiate a meeting with the Advisor no less than annually. *However, clients are obligated to immediately inform the Advisor of any changes in their financial situation to provide the Advisor with the opportunity to review the new data to ensure it the portfolio continues to be structured to help meet the client's stated needs and objectives.*

Performance Accounts and Side-by-Side Management

The Advisor may enter into performance-based fee arrangements with qualified clients. The Advisor may receive incentive fees based on a share of capital gains on or capital appreciation of the assets or any portion of the assets of an advisory Client, in accordance with the investment management agreement executed between the client and Advisor, in compliance with the requirements set forth in applicable laws and regulations. The performance fees charged by the Advisor may be higher or lower than fees charged by other advisers for comparable services.

Clients should be aware that a performance-based fee arrangement can create an incentive for the Advisor to recommend investments that are riskier or more speculative than those recommended under a different fee arrangement. The Advisor works to mitigate this conflict by selecting investments that we believe are appropriate for clients in accordance with the Advisor's and the client's investment strategies; The Advisor has established procedures designed and implemented to (i) ensure that all clients are treated fairly and equally, and (ii) prevent potential conflicts with respect to allocations of investment opportunities among clients.

Other Important Program Considerations

- Wrap fee programs are not suitable for all investment needs and any decision to participate in a wrap fee program should be based on your financial situation, investment objectives, tolerance for risk, and investment time horizon, among other considerations. The designed strategies and any client-imposed restrictions / guidelines may affect the composition and performance of a client's portfolio. For these reasons, portfolio performance may vary from that of other clients. Further, based on the individualized nature of services, there may be extended periods of time when the Advisor determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the Advisor's Program fee will continue to apply during these periods.
- The investment products available within the Program can be purchased by clients outside of the wrap fee program account via unaffiliated financial services firms. When utilizing another firm, the Advisor's ongoing management services would not be provided.
- When managing a client's account on a wrap fee basis, we receive as compensation for our investment advisory services, the balance of the total wrap [or program] fee

you pay after custodial, trading, and other management costs (including execution and transaction fees) have been deducted.

The Advisor does not charge clients higher advisory fees based on their trading activity, but you should be aware that we have an incentive to limit our trading in your account(s) because we are charged for executed trades.

We encourage you to review Schwab's pricing to compare the total costs of entering into a wrap fee arrangement versus a non-wrap fee arrangement. If you choose to enter into a wrap fee arrangement, your total cost to invest could exceed the cost of paying for brokerage and advisory services separately. To see what you would pay for transactions in a non-wrap account please refer to Schwab's most recent pricing schedules available at <https://www.schwab.com/aspricingguide>.

Fees

Factors that impact the relative cost of the program include the trading activity in the managed account as discussed herein. Participation in the wrap fee program may cost clients more or less than engaging another Advisor separately (for non-wrap services). As discussed in this section, the program fees are negotiable and agreed in the Advisor's Wrap Fee Program Agreement. The Advisor receives a portion of the wrap fee for portfolio management services and Charles Schwab & Co., Inc. receives a portion of the fee for trade execution and custodial services.

1. The Advisor's Program fees are calculated as a percentage of assets under management by household and combines portfolio management, commissions, trade execution costs, custody and other standard brokerage services within a single investment management fee. The fee does not include separate administrative costs that may be charged by sponsors of mutual funds or excluded funds held in the account. **The agreed upon annual fee is negotiable**, based on the nature, complexity, and scope of services as well as the amount and nature of assets to be managed, pre-existing relationships, and other factors, at the discretion of the Advisor as follows:

Account Value	Standard Fee Schedule
\$0 - \$500,000	1.25%
\$500,001 and above	1.00% or negotiable
<i>All fees are negotiable</i>	

The fees are charged based on a flat percentage using total account value (including cash and cash equivalent positions such as money market funds), as opposed to a tiered rate. The account value will be based upon the total value of all accounts attributable to the same household, so the same fee rate will be applied to each of those accounts. Different accounts within a household may have a different fee structure based on the assets involved. The agreed upon fee schedule will be established in the Advisor's Client Agreement.

Fees are paid monthly in advance, except for the initial month which is billed pro rata in arrears.

RWA has had different fee schedules in place in the past and, as stated above, our fees are negotiable at our discretion, which means that not all RWA clients are paying the same fees.

The investment management fee may be revised during the engagement, particularly if different needs and/or complexities arise, or the scope of services should change. In such cases, the Advisor will notify the client of its intention to modify the fee with at least 30 days' written notice. Should the client decide not to accept the amended fee terms, the client is

welcome to terminate services with 5 days' written notice prior to the effective date of the fee modification.

While the Advisor takes the position that its fees are competitive, fees may be higher or lower than fees charged by other financial services providers for similar services.

2. Performance-Based Fee Arrangements

For Qualified clients, as defined by the Securities and Exchange Commission, the Advisor may negotiate a fee based on a combination of a percentage of assets under management and a performance fee. In such cases, the Advisor charges a maximum asset management 10% of the annual gross profits for the account in performance fees. The performance fee is invoiced directly to the client and is payable annually, in arrears. No performance fee will be charged, except to the extent that the amount of the capital increase exceeds the sum of any cumulative loss in the account on a yearly basis. In the event the client makes a complete withdrawal from the account on a date other than the end of the year, fees will be due at the time of withdrawal. Annual gross profits are defined as the difference in the value of the account for the previous 4 quarters, adjusted for deposits and withdrawals made during the year. Clients are hereby advised that performance-based fees are higher than industry norm and similar (but non-performance-based) advisory services can be obtained for less. Please see important disclosures in Item 6 of this Brochure which discusses side-by-side management.

Other Fees and Fees Associated with Investing

The Program fee does not include mark-ups, and mark-downs, dealer spreads or other costs associated with the purchase or sale of securities, interest, taxes, or other costs, such as national securities exchange fees, charges for transactions not executed through Charles Schwab & Co., Inc., costs associated with exchanging currencies, wire transfer fees, or other fees required by law or imposed by third parties. The investor's account will be responsible for these additional fees and expenses.

All fees paid to the Advisor for advisory services are separate from the fees and expenses charged to shareholders of exchange traded funds (ETFs) or mutual fund shares offered by mutual fund companies. A complete explanation of the expenses charged by a mutual fund or ETF is contained in the respective fund prospectus. Clients are encouraged to read each prospectus and securities offering document. If a mutual fund previously purchased by or selected by a client should impose a sales charge, a client may pay an initial or deferred sales charge. The Advisor does not receive any portion of these investment-related fees. Such charges, fees and commissions are exclusive of and in addition to the Advisor's fees. However, in their separate capacities as registered representatives of an unaffiliated broker/dealer, the investment adviser representatives of the Advisor do accept commissions for securities recommendations.

Compensation Matters

The Advisor's investment adviser representatives do not receive referral-based incentives associated with recommending the Advisor's wrap fee program. Obviously, a higher management fee has the potential to increase the Advisor's and the investment adviser representative's compensation and thus there exists an incentive to recommend the Program over other services. However, such compensation is impacted by the costs associated with the managed account(s) since the Program pays for various account charges as described above. The investment management fee associated with the Program may be higher or lower than non-wrap services or similar services offered by other firms. Program fees are negotiable as described in this section.

Payment of Fees

The Advisor's contractually agreed fees will be deducted from clients' custodial accounts with our client's authorization. The Advisor adheres to the following required criteria when payment is deducted from the client's account via a qualified custodian, as required by the SEC as

follows: 1) The client provides written authorization permitting the fees to be paid directly from the client's account held by the independent qualified custodian and the authorization is limited to withdrawing contractually agreed upon investment advisor fees; (2) The client will directly receive regular account statements directly from the qualified custodian which reflect the Advisor's fee deduction; (3) The frequency of fee withdrawal shall be specified in the written authorization/client agreement; (4) The custodian of the account shall be advised in writing of the limitation on the Advisor's access to the account and; (5) The client shall be able to terminate the written billing authorization or agreement at any time.

It is important to note that custodial firms do not verify advisory fees. Therefore, clients should review their custodial statements carefully. If a client should have any questions or concerns in connection with an advisory fee deduction, they should promptly contact the Advisor and Betterment. If at any time during the engagement, the client fails to receive the regular statements produced by the custodian or they have new address information to report, it is important for the client to promptly notify the Advisor and their custodian.

Termination of Services

The client may terminate services within five business days of signing the investment management agreement and without penalty or fees due if the Advisor's Form ADV 2 Brochure (and Betterment's Brochure, if applicable) was not delivered at least 48 hours prior to engagement. Alternatively, either party may terminate services with 5 days' notice. As fees are charged in advance, where services are terminated prior to the end of the billing period, the Advisor will return a pro-rated refund for any unearned fees.

ITEM 5: ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

The Advisor offers investment advisory services to individuals and high net worth individuals.

The suggested account minimum for investment management services is \$250,000 but can be negotiated based upon individual circumstances.

A client seeking performance-based services, as discussed at Item 5.A of this brochure, must meet the definition of a qualified client as established by the United States Securities and Exchange Commission (assets under the Advisor's management of at least \$1,100,000, or a minimum liquid net worth of \$2,200,000).

Since ongoing investment management services and participation in the wrap fee program may not be appropriate for some investors, the Advisor reserves the right to decline to provide services to any person or firm and for any reason.

ITEM 6: PORTFOLIO MANAGER SELECTION AND EVALUATION

The Advisor is the Wrap Fee Program's Sponsor and Manager.

The Advisor's services and fees are discussed at Item 4 of this Program Brochure.

Additional Information – Internal Reviews

Investment Management Services involve frequent monitoring of portfolios. Portfolios are reviewed no less than quarterly and underlying securities are generally reviewed daily. Reviews are performed by The Advisor's Investment Advisor Representatives. Portfolios are analyzed in relation to the client's stated investment objectives, risk profile, tax situation and market conditions.

Individual client reviews are conducted no less than annually in order to provide the client with the opportunity to review their profile data and investment strategies. Investment Advisor Representatives conduct periodic client meetings and have frequent telephonic contacts in which investment objectives, market conditions and other factors are discussed with clients.

Clients are welcome to initiate meetings (telephonically, electronically or in person) throughout the year. However, clients are obligated to promptly contact the Advisor when there exists a real or potential change in the clients' financial condition or if a change in strategy may be contemplated. This prompt notification gives the Advisor the opportunity to review the clients' new information and determine if it impacts the advice and recommendations prepared for the client.

Performance-Based Accounts and Side-by-Side Management

As previously disclosed in Item 5 of this Brochure, the Advisor may enter into performance-based fee arrangements with qualified clients. The Advisor may receive incentive fees based on a share of capital gains on or capital appreciation of the assets or any portion of the assets of an advisory Client, in accordance with the investment management agreement executed between the client and Advisor, in compliance with the requirements set forth in applicable laws and regulations. The performance fees charged by the Advisor may be higher or lower than fees charged by other advisers for comparable services.

Clients should be aware that a performance-based fee arrangement can create an incentive for the Advisor to recommend investments that are riskier or more speculative than those recommended under a different fee arrangement. The Advisor works to mitigate this conflict by selecting investments that we believe are appropriate for clients in accordance with the Advisor's and the client's investment strategies; The Advisor has established procedures designed and implemented to (i) ensure that all clients are treated fairly and equally, and (ii) prevent potential conflicts with respect to allocations of investment opportunities among clients.

Methods of Analysis, Investment Strategies, and Risk of Loss

The Program provides personalized investment management services to its clients and portfolio advice is available for clients interested in conservative to moderately aggressive strategies; with advice designed to meet varying needs of and within the direction set forth by the investors. The Advisor seeks to design advice that is best suited to a client's stated unique needs after clients have defined their objectives, risk tolerance, and time horizons and the selection is approved by the client.

Based on information provided by the client, the Advisor seeks to evaluate an investor's risk tolerance, time horizon, goals and objectives through an interview and data-gathering process in an effort to determine an investment strategy and portfolio design to best fit the investor's profile. Client participation and the client's delivery of accurate and complete information are critical to the Advisor's process. In performing its services, the Advisor is not required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information.

The Advisor considers securities investments based on its professional judgment and the experience of its investment advisor representatives coupled with publicly available research and analysis. Asset allocation software and historical performance modeling software may also be utilized. Of course, no method of analysis can guarantee success. The Advisor's recommended investment strategies may be based upon a number of concepts and determined by the type of investor. This process attempts to coordinate the client's objectives for risk vs. return with the Advisor's analysis of the macro environment. Registered funds are researched and monitored internally by the Advisor with a process that emphasizes investment philosophy, management quality, and overall expense ratios. Portfolio holdings or recommendations are generally judged by track record and performance of like-kind investments. While pure market timing strategies are generally not used, Selected Models from RWA may employ risk on strategies when indicators and market conditions warrant as well as risk reduction strategies during times of heightened market volatility.

Changing conditions in the client's financial life or significant changes in market conditions may warrant a collaborative effort with the client to modify their strategic investment framework, which consequently may also trigger changes to investment holdings within the portfolio.

The Advisor may recommend its Program, the services of itself as Investment Advisor, its Investment Advisor Representatives in their individual capacities as investment managers, and the services of other industry entities to implement recommendations. Any other professional referrals (*i.e.*, accounting professionals, tax preparers, legal professionals, etc.) may be provided but *solely* as a courtesy and the Advisor and its personnel receive no direct or indirect compensation as a result of referrals. Clients are welcome but are never under any obligation to act upon any of the recommendations made by the Advisor or to engage the services of any recommended service firm or professional including the Advisor itself. Clients should appropriately research other service providers before engaging those services.

Investors may prefer to utilize the investment management styles offered via the Strategic Models. These strategies fall within one of 3 general categories: conservative, moderate/balanced and growth. Each model generally holds the same positions but with different percentages based on the amount of risk involved. These positions may include the use of stocks, exchange traded funds, and mutual funds. The tactical nature of the strategy allows the flexibility to move away from equity positions to cash or bonds when risk is deemed high. Please reference Item 4 of this Brochure for additional information provides about these strategies.

It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear.

Material Risks Involved

The Advisor takes the general position that investors with diverse portfolios have a better chance of making a profit because it is difficult to accurately predict the movement of the economy. However, no single strategy can be relied upon to outperform the market. The Advisor does not attempt to time the market. Frequent trading is not recommended as it can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. The Advisor does not generally recommend short sales, margin transactions and options writing as they are generally associated with greater risk. **In contrast, the Strategic Models**, as discussed at Items 4 and 6 of this Brochure, do seek to time investments. Please refer to these sections for important information concerning this manager's strategies.

Clients may make additions to and withdrawals from the account at any time, subject to customary securities settlement procedures and the Advisor's right to terminate services (such as when assets dip so low as to make investment management inappropriate for the client). Asset withdrawals may impair the achievement of a client's investment objectives.

All investment strategies involve risk and may result in a loss of an investor's original investment. Many of these risks apply equally to stocks, bonds and any other investment or security. Identified material risks associated with the Advisor's investment strategies include:

Defensive Risk: To the extent that the strategy attempts to hedge or take defensive measures such as holding a significant portion of its assets in cash or cash equivalents, the objective may not be achieved.

External Events: As we know from recent events, the market can be impacted by external events such as pandemic, supply chain issues, natural disasters, terrorism, war, etc.

Fixed Income Risk: Fixed income securities are subject to the risk of the issuer's or a guarantor's inability to meet principal and interest payments on its obligations and to price volatility. Fixed-income securities are generally subject to the following risks:

- **Interest Rate Risk.** The value of investments in fixed-income securities will change based on changes in interest rates. If interest rates increase, the value of these investments generally decline. Securities with greater interest rate sensitivity and longer maturities generally are subject to greater fluctuations in value.
- **Extension Risk.** If interest rates rise, repayments of principal on certain fixed-income securities may occur at a slower-than-expected rate and, as a result, the expected maturity of such securities could lengthen which could cause their value to decline.
- **Credit Risk.** Fixed income investments are subject to the risk that issuers and/or counterparties will fail to make payments when they are due or default completely. Prices of the investments may be adversely affected if any of the issuers or counterparties are subject to an actual or perceived deterioration in their credit quality. Credit spreads may increase, which may reduce the market values of fixed income securities. Credit spread risk is the risk that economic and market conditions or any actual or perceived credit deterioration may lead to an increase in the credit spread (i.e., the difference in yield between two securities of similar maturity but different credit quality) and a decline in price of the issuer's securities.
- **Prepayment Risk.** Issuers of certain fixed income securities may be able to prepay principal due on these securities, particularly during periods of declining interest rates, and Villere may have to invest the proceeds in lower-yielding securities.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

International Investing Risk: Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social, or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, and regulatory and financial reporting standards, which differ from those of the U.S.

Investment Strategy Risk: This risk exists when an Advisor's strategy may fail to produce the intended results.

Large-Sized Companies Risk: Larger, more established companies may be unable to respond quickly to new competitive challenges like changes in consumer tastes or innovative smaller competitors. In addition, large-cap companies are sometimes unable to attain the high growth rates of successful, smaller companies, especially during extended periods of economic expansion.

Legal or Legislative Risk: Legislative changes or court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Margin Transactions: Investors utilizing margin accounts must carefully review the margin agreement provided by the selected brokerage firm. These firms charge interest on the funds loaned to purchase securities on margin and an investor needs to understand the additional charges he or she may incur by opening a margin account. Additionally, risks associated with margin accounts include: The loss of more funds than an investor deposits into the margin which may require the investor to deposit additional funds to avoid the forced sale of securities in the account. Additionally, if the equity in the account falls below the maintenance margin requirements under the law or the firm's higher "house" requirements, the firm can sell the

securities in the account to cover the margin deficiency. Investors are also responsible for any short fall in the account after such a sale. Additionally, the selected firm can sell the securities in the account without contacting the investor (although as a courtesy many firms do attempt contact). Investors are not entitled to a time extension on margin calls. While extensions are sometimes given under certain conditions, investors do not automatically have a right to time extensions. An investor does not have a right to an extension of time to meet a maintenance margin call.

Market Risk: Market risk involves the possibility that an investment's current market value will decline due to general market decline, thus reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Market Capitalization Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium-cap companies may face a greater risk of business failure, which could increase the volatility of the clients' portfolios.

Small- and Medium-Sized Companies Risk: Investing in securities of smaller companies including micro-cap, small-cap, medium-cap and less seasoned companies often involve greater volatility than investing in larger, more established companies and these securities may be less liquid than other securities.

Political Risk: The chance that a change in government may affect stock prices of domestic or international stocks.

Sector/Industry Risk: In connection with Jon Arnold's management strategy, from time to time, client portfolios may have overweighted positions in particular market sectors and/or industries, which can be more volatile and/or underperform relative to the market as a whole.

Style Risk: The Advisor's strategy may consist of "value" and or "growth" investments. With respect to securities and investments considered undervalued by the Advisor, market prices may not reflect our determination that the security is undervalued, and its price may not increase to what we believe to be its full value and may even decrease in value. With respect to "growth" investments, the underlying earnings or operational growth anticipated may not occur, or the market price of the security may not increase as anticipated.

Tax Considerations: The Advisor's strategies and investments can have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Unaffiliated Money Managers: If a portion of your assets is managed by a third-party money manager (such as Betterment), we will not determine the investments to be made for your account, but we will monitor the investments in the accounts and advise you on those holdings for so long as we are providing investment management services.

Other (non-securities)

Annuities are retirement products for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirements or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial

taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Clients are hereby advised to read each offering document carefully before investing. Past performance is not a guarantee of future returns.

Investing in securities involves a risk of loss that all clients should be prepared to bear.

Risks of Specific Securities Utilized

The Advisor generally seeks investment management strategies that do not involve significant or unusual risk beyond that of the general domestic and / or international equity markets. Investing in the financial markets, including the securities The Advisor recommends to clients, involves the risk of loss—including loss of principal. While the Advisor attempts to manage risks associated with the financial markets and the securities it recommends to clients, the Advisor makes no guarantee or promise that advice given will not result in losses. Past investment performance of any investment is not a guarantee of future results.

Investments in mutual funds may bear a risk of investment loss. Clients who invest should also be prepared to bear a loss of investment proceeds. While the Adviser monitors underlying fund investments, it is possible that a fund manager's strategy will not provide desired results.

Exchange traded funds (ETFs) - ETF Risks, including Net Asset Valuations and Tracking Error:

ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate. Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by the Advisor plus any management fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a client's portfolio performance or an index benchmark comparison. Expenses of the fund may include investment adviser management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Investments in individual stocks can be risky. Some risks can be controlled, and some risks can be guarded against, but no investment strategy can carry guarantees from loss. Certain market risks cannot be controlled, such as market or economic conditions. Certain strategies may be employed to adjust portfolios, or the Adviser and client may agree to hold the portfolio's course. The Advisor designs portfolio strategies for the long-term, unless otherwise specifically requested in writing. Therefore, the Adviser does not attempt to time the market.

Fixed income investments generally are utilized as a portfolio diversification element as well as for income-deriving investments outside of equity exposure.

There are certain risks involved in investing in bonds: Government, Municipal, and Corporate and the following is an overview of the types of risks that one should consider: Interest rate risk; reinvestment risk; inflation risk; mark risk, selection risk, timing risk, and price risk. Additional risks for some government agency, corporate and municipal bonds may include

Legislative risk (a change in the tax code could affect the value of taxable/tax-exempt interest income); Call risk (some corporate, municipal and agency bonds have a “call provision” entitling their issuers to redeem them at a specified price on a date prior to maturity. Declining interest rates may accelerate the redemption of a callable bond, causing an investor’s principal to be returned sooner than expected. In that scenario, investors have to reinvest the principal at the lower interest rates. If the bond is called at or close to par value, as is usually the case, investors who paid a premium for their bond also risk a loss of principal. In reality, prices of callable bonds are unlikely to move much above the call price if lower interest rates make the bond likely to be called. Additionally, there may be a liquidity risk involved if investors have difficulty finding a buyer when they want to sell and may be forced to sell at a significant discount to market value. Liquidity risk is greater for thinly traded securities such as lower-rated bonds, bonds that were part of a small issue, bonds that have recently had their credit rating downgraded or bonds sold by an infrequent issuer. Bonds are generally the most liquid during the period right after issuance when the typical bond has the highest trading volume. Additional risks for corporate and municipal bonds may include Credit risk; default risk; event risk and duration risk.

Bank obligations, including bonds and certificates of deposit, may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are highly dependent upon short-term interest rates and may be adversely affected by downturns in the U.S. and foreign economies and/or changes in regulations.

Delaware Statutory Trusts. These investments have a unique set of risks and are only appropriate for accredited investors. Risks may include but are not limited to: Illiquidity risk (investment must be held for an extended period of time), loss of control (no decision making over property, sponsor controls management and selling of property), regulatory risk (change in tax rules which could result in tax liabilities), execution risk (operator competence) and economic risk. There can be no assurance that a property will perform as projected and Delaware Statutory Trusts are subject to economic volatility, tenants not paying their rent as expected, and other traditional risks of owning, selling, and operating real estate. The fees and expenses of each offering should be carefully evaluated. Multiple owner offerings typically have additional expenses versus owning real estate on your own and these fees should be weighed against specific capital gains tax liability. All investors are encouraged to have their tax and legal counsel advise them on taxes including any federal and state capital gains taxes, depreciation recapture and any other tax issues, which could be applicable.

Covered Call Options. While this strategy can provide income, it limits your ability to participate in any increase in the price of the underlying security above the strike price. Furthermore, a covered call strategy does not eliminate the risk of market-based losses on the underlying stock. In fact, if the stock price declines, the premium received from the option may not be sufficient to offset the loss in the value of the underlying security. Additionally, the option can be exercised at any time, requiring you to sell the underlying security at the strike price, potentially below the market price. Market conditions can negatively impact option values or the ability to close positions favorably and the forced sale of shares upon assignment may trigger taxable events.

Inverse ETFs. This strategy is used to hedge client portfolios against market downturns or to seek returns that are the inverse of a specific benchmark on a daily basis. They are designed to achieve their investments objectives on a daily basis. They are not intended to track the underlying index over periods longer than a single day. Due to the effect of daily compounding, performance over longer periods can differ significantly from the inverse of the underlying index. In volatile markets, an inverse ETF may lose money even if the underlying index decreases over time. Holding inverse ETFs for longer than one trading session increases risk due to the compounding of returns. As such, these investments are generally considered unsuitable for long-term holding. These products may not achieve their stated objectives. If the market rises, the inverse ETF will lose value, and you may lose a significant portion or all of your principal investment.

It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear.

Voting Client Securities (Proxies)

As a matter of policy and practice, RWA will not vote proxies on behalf of clients. Clients will retain voting authority and can expect to receive voting materials directly from their custodian.

The Advisor is available to assist clients with questions and concerns relating to proxies. The Advisor does not engage in proxy-related discussions with non-clients and does not solicit proxies.

Deviations from these policies will result in a prompt amendment of this Form ADV 2A Brochure and may require the Advisor to comply with SEC Proxy Registration Rules.

ITEM 7: CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

The Advisor is the Program's Sponsor and Manager and therefore, the Program does not utilize other portfolio managers.

ITEM 8: CLIENT CONTACT WITH PORTFOLIO MANAGERS

The Advisor is the Program's Sponsor and Manager and therefore, as with our non-wrapped investment management services, the Advisor welcomes communications with our clients. Clients are welcome to contact the Advisor at any time during our normal office hours.

Individual client reviews are conducted no less than annually in order to provide the client with the opportunity to review their profile data and investment strategies. Investment Advisor Representatives conduct periodic client meetings and have frequent telephonic contacts in which investment objectives, market conditions and other factors are discussed with clients.

Clients are welcome to initiate meetings (telephonically, electronically or in person) throughout the year. However, clients are obligated to promptly contact the Advisor when there exists a real or potential change in the clients' financial condition or if a change in strategy may be contemplated. This prompt notification gives the Advisor the opportunity to review the clients' new information and determine if it impacts the advice and recommendations prepared for the client.

ITEM 9: ADDITIONAL INFORMATION

Disclosure-Disciplinary Information

Registered Investment Advisors are required to disclose legal and disciplinary events that may be material to a *client's* or prospective *client's* evaluation of the Advisor's practice or the integrity of its management. **The Advisor has responded to each item below:**

A. A criminal or civil action in a domestic, foreign, or military court of competent jurisdiction in which your firm or a *management person*:

1. was convicted of or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses. 2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses. 3. was found to have been involved in a violation of an investment-related statute or regulation; or 4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a

management person from engaging in any investment- related activity, or from violating any investment-related statute, rule, or order.

Neither the Advisor nor its management persons have any disclosure information to report for Item 9.A.1., Item 9.A.2, Item 9.A.3, and Item 9.A.4.

B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which your firm or a *management person*:

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
2. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority (a) denying, suspending, or revoking the authorization of your firm or a *management person* to act in an *investment-related* business (b) barring or suspending your firm's or a *management person's* association with an *investment related* business (c) otherwise significantly limiting your firm's or a *management person's investment-related* activities; or (d) imposing a civil money penalty of more than \$2,500 on your firm or a *management person*.

Neither the Advisor nor its management persons have any information to report for Items 9.B.1 and 9.B 2(a-d).

C. A *self-regulatory organization (SRO) proceeding* in which your firm or a *management person*:

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
2. was *found* to have been *involved* in a violation of the *SRO's* rules and was:(i) barred or suspended from membership or from association with other members or was expelled from membership; (ii) otherwise significantly limited from *investment-related* activities; or (iii) fined more than \$2,500.

Neither the Advisor nor its management persons have any information to report for Items 9.C.1 and 9.C.2.

Note: Individual information about The Advisor's management persons and investment advisor representatives is contained in their Form ADV Part 2B Brochures which are attached directly behind this firm Brochure. One investment adviser representative (Mr. Curly) has a reportable event from 1972 when he was a college student. Mr. Arnold has a reportable event from 2012. If you did not receive these Brochures, please contact the Advisor via the contact information contained on the cover page of this Brochure.

Other Financial Industry Activities and Affiliations

Registration as a broker/dealer or broker/dealer representative

The Advisor is not registered as a broker/dealer and no such registration is pending.

As disclosed in Item 10.C below, Adam Stalnaker, Joseph Kovach, and Michael Curley are separately registered as registered representatives of Private Client Services and in this capacity, they accept commissions for the sale of securities.

Registration as a futures commission merchant, commodity pool operator or a commodity trading adviser

Neither the Advisor nor its Investment Advisor Representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor and no such registrations are pending.

Registration relationships material to this advisory business and conflicts of interest

Neither the Advisor nor its Investment Advisor Representatives have any registration relationships, legal affiliations or any association with the following businesses that would present a possible conflict of interest and no such relationships are pending.

- ❖ broker-dealer, municipal securities dealer, government securities dealer or broker
- ❖ investment company or other pooled investment vehicle (including a mutual fund, closed- end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)
- ❖ futures commission merchant, commodity pool operator or trading advisor
- ❖ banking or thrift institution
- ❖ lawyer or law firm
- ❖ insurance company or agency*
- ❖ pension consultant
- ❖ real estate broker or dealer
- ❖ sponsor or syndicator of limited partnerships.

The Advisor does not operate and does not have a material relationship with a hedge fund or other type of private pooled investment vehicle.

Adam Richard Stalnaker, Joseph J. Kovach and Michael A. Curley are separately engaged and dually registered as registered representatives of an unaffiliated broker/dealer (Private Client Services LLC) and receive commissions for securities transactions placed with this broker/dealer.

*Adam R. Stalnaker, Joseph J. Kovach, and Michael A. Curley are separately engaged as independently licensed insurance agents and receive normal commissions paid by insurance companies when clients purchase insurance through them.

Investment Advisor Representative, Andrew Smith, is the owner of an accounting firm and receives separate and customary payment for delivering any accounting related services. Some advisory clients may also be accounting clients of Mr. Smith. This creates a conflict in that Mr. Smith has an incentive to recommend his accounting firm to RWA clients and RWA to accounting clients. Clients are under no obligation to utilize Mr. Smith for any accounting services.

The Advisor is a fiduciary to each of its clients. The receipt of commissions by its registrants poses a conflict of interest between the Adviser and its clients. *Please refer to the important disclosure at Item 5.E of this Brochure as it addresses the conflicts of interest, The Advisor’s fiduciary duty to its clients and how the conflicts are managed.*

Selection of Other Advisers or Managers and How this Adviser is Compensated for Those Selections

Outside of the Program and as discussed in the Adviser’s Form ADV 2A Brochure at Item 4.B, the Advisor has entered into an agreement with Betterment, LLC (“Betterment”) to utilize among other things, Betterment’s software, advice, and digital services on a sub-advisory basis.

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

The Advisor takes the issues of fiduciary duty and regulatory compliance seriously and is committed to maintain compliance with state and applicable federal securities laws. The Advisor has a position of public trust, and it is our goal to maintain that trust; provide excellent service, good investment performance; and advice that is suitable.

The Advisor places great value on ethical conduct. Therefore, the ultimate goal of our internal policies is to challenge our staff to live up not only to the letter of the law, but also to the ideals

set forth by the Advisor. Clients may be familiar with the roles fiduciaries play in various legal situations and in certain industries. As a Registered Investment Advisor, the Advisor is a fiduciary to each and every client. As fiduciaries, Registered Investment Advisors owe their clients several specific duties. In accordance with the SEC's Regulation Best Interest, an Investment Advisor's fiduciary duties include:

- Providing advice that is suitable based on information gathered from the client
- Providing full disclosure of material facts and potential conflicts of interest (such that the client has complete and accurate disclosure in order to make an informed decision about services of the Advisor and about investment recommendations)
- The utmost and exclusive loyalty and good faith
- Best execution of transactions under the available circumstances
- The Advisor's reasonable care to avoid ever misleading clients
- Only acting in the best interests of clients.

It is The Advisor's policy to protect the interests of each of our clients and to place clients' interests first and foremost. The Advisor will abide by honest and ethical business practices to include, but not limited to:

- The Advisor will not induce trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account.
- The Advisor will make investment decisions with reasonable grounds to believe that the decisions are suitable for the client on the basis of information furnished by the client and we will document suitability.
- The Advisor and its Investment Advisor Representatives will not borrow money from clients, nor will they lend money to clients.
- The Advisor will not recommend the purchase of a security without the reasonable belief that the security is registered, or the security or transaction is exempt from registration in states where we provide investment advice and based upon information the Advisor receives.
- The Advisor will not recommend that a client place an order to purchase or sell a security through a broker/dealer or agent, or engage the services of an unlicensed brokerage firm, based upon information available to the Advisor.
- The Advisor's Member and staff (if applicable) will report all required personal securities transactions to Thomas V. David, Chief Compliance Officer as required by securities rules and regulations. Reportable trades for the Advisor include all *but the following exceptions*:
 - ❖ Transactions effected pursuant to an automatic investment plan
 - ❖ Securities held in accounts over which the access person has no direct or indirect influence or control
 - ❖ Transactions/holdings in direct obligations of the US Government
 - ❖ Money market instruments — bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high- quality short-term debt instruments
 - ❖ Shares of money market funds
 - ❖ Transactions and holdings in shares of mutual funds, since the Advisor does not have a material relationship with an investment company
 - ❖ Transactions in units of a unit investment trust are not reportable if the UIT is invested exclusively in unaffiliated mutual funds.

All applicable securities rules and regulations will be strictly enforced. The Advisor will not permit and has instituted controls against insider trading. Investment Advisor Representatives and administrative personnel who do not follow the Advisor's Code of Ethics or who in any way violate securities rules and regulations, or who fail to report known or suspected violations will be disciplined or terminated, depending upon severity. Such persons could also face action by the SEC and/or state securities regulators.

Clients are welcome to request a copy of the Advisor's Code of Ethics by contacting the Advisor's office.

Recommendations Involving Material Financial Interests

The Advisor does not recommend that clients buy or sell any security in which any of The Advisor or its related persons have a material financial interest.

Investing Personal Monies in the Same Securities as Clients

The Advisor and/or individuals associated with the Advisor may have similar investment goals and objectives and as a result may buy or sell securities for their personal accounts that may be identical to or different from those recommended to clients. Thus, at times the interests of staff members' accounts may coincide with the interests of clients' accounts. However, at no time will the Advisor or its related persons receive an added benefit or advantage over clients with respect to these transactions nor will the Advisor or its staff ever place themselves in a position to have added benefit as a result of advice given to clients. The Advisor's Chief Compliance Officer monitors access person's personal trading activities.

Trading Securities at / around the Same Time as Clients

The Advisor acknowledges the Advisor's fiduciary responsibility to place the investment needs of clients ahead of the Advisor and its staff. The interests of clients are held in the highest regard. At no time will the Advisor or its personnel receive an added benefit or advantage over clients with respect to these transactions. The Advisor and its personnel will not place itself in a position to have added benefit as a result of advice given to clients. The Advisor and its personnel will not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. The Advisor has established trading policies for its access persons. The Advisor's Chief Compliance Officer is responsible for the monitoring of personal trading conducted by staff.

Financial Information

Balance sheet

The Advisor does not accept fees for services that involve \$500 or more for services to be performed six or more months in advance. The Advisor does not maintain custody of client funds and securities and therefore is not required to include a balance sheet with this Brochure.

Financial conditions reasonably likely to impair the adviser's ability to meet contractual commitments to clients

Neither the Advisor nor its management have a financial condition that is reasonably likely to impair the Advisor's ability to meet contractual commitments to clients.

Bankruptcy petitions in previous ten years

The Advisor, its owners and its investment adviser representatives have not been party to a bankruptcy petition during the previous 10 years.