

Form ADV Part 2B: Disclosure Brochure Supplement



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1. Cover Page

Alexa Jo Kane

Pearl Planning, LLC

ADV Part 2B, Brochure Supplement

Dated: January 21, 2022

Contact: Sheryl Stephens, Chief Compliance Officer
5206 Gateway Centre, Suite 300
Flint, Michigan 48507

This Brochure Supplement provides information about Alexa Jo Kane that supplements the Pearl Planning, LLC Brochure; you should have received a copy of that Brochure. Please contact Sheryl Stephens, Chief Compliance Officer, if you did not receive Pearl Planning's Brochure or if you have any questions about the contents of this supplement.

Additional information about Alexa Jo Kane is available on the SEC's website at www.adviserinfo.sec.gov.

2. Education Background and Business Experience

Alexa Jo Kane was born in 1989. Ms. Kane graduated from South Dakota University in 2012 with a Bachelor of Science degree in consumer affairs. Ms. Kane has been employed as a financial advisor of Pearl Planning, LLC since October of 2021. From September of 2020 to October of 2021, Ms. Kane was an investment advisor representative of Raymond James Financial Services Advisors, Inc. From September of 2014 to October of 2021, she was a registered representative of Raymond James Financial Services, Inc. From July of 2020 to September of 2020, she was a financial advisor of Mercer Global Advisors. From June of 2014 to August of 2020, Ms. Kane was a financial advisor of M.J. Smith & Associates.

Ms. Kane has been a CERTIFIED FINANCIAL PLANNER™ professional since 2017. Certified Financial Planner Board of Standards, Inc. ("CFP Board") owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the "CFP® marks"). The CFP Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board's initial and ongoing certification requirements.

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 88,000 individuals have obtained CFP® certification.

To attain the right to use the CFP® marks, an individual must currently satisfactorily **fulfill** the following requirements:

- Education - Complete a college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services or an accepted equivalent, including [completion of a financial plan development capstone course](#), and attain a Bachelor's Degree from an accredited college or university. CFP Board's financial planning subject areas include professional conduct and regulation, general principles of financial planning, education planning, risk management and insurance planning, investment planning, income tax planning, retirement savings and income planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - CFP Board requires 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship Pathway that meets additional requirements; and
- Ethics - Agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct*, which put clients' interest first; acknowledge CFP Board's right to enforce them through its *Disciplinary Rules and Procedures*; comply with the *Financial Planning Practice Standards* which determine what clients should reasonably expect from the financial planning engagement and complete a CFP® Certification Application which requires disclosure of an individual's background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by the individual's employer or firm.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours accepted by the CFP Board every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board's Code of Ethics and Standards of Conduct and to acknowledge CFP Board's right to enforce them through its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP® professionals provide financial planning services in the best interests of their clients.

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CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

You may [verify an individual's CFP® certification](#) and background through the CFP Board. The verification function will allow you to verify an individual's certification status, CFP Board's disciplinary history and any bankruptcy disclosures in the past ten years. Additional regulatory information may also be found through [FINRA's BrokerCheck](#) and the [SEC's Investment Adviser Public Disclosure databases](#), which are free tools that may be used to conduct research on the background and experience of CFP® professionals and those who held CFP® certification at one time, including with respect to employment history, regulatory actions, and investment-related licensing information, arbitrations, and complaints.

Ms. Kane has held the designation of Certified Divorce Financial Analyst® (CDFA®) since 2018. The Certified Divorce Financial Analyst® (CDFA®) designation is issued by The Institute for Divorce Financial Analysts (IDFATM), which is a national organization dedicated to the certification, education, and promotion of the use of financial professionals in the divorce arena.

Founded in 1993, IDFATM provides specialized training to accounting, financial, and legal professionals in the field of pre divorce financial planning. Over the years, IDFATM has certified more than 5,000 professionals in the U.S. and Canada as Certified Divorce Financial Analysts® (CDFAs®). The CDFAs® designation is available to individuals who have a minimum of three years experience as a financial professional, accountant, or matrimonial lawyer. To acquire the designation, a candidate must successfully pass all exams and be in good standing with their broker dealer (if applicable) and the FINRA/SEC or other licensing or regulatory agency.

To earn the designation, the participant must complete a series of self-study course modules and pass an examination for each module. The American module topics are:

- Financial and legal issues of divorce
- Advanced financial issues of divorce
- Tax issues of divorce
- Working as a CDFAs: case studies

Continuing Education (CE)

To retain the Certified Divorce Financial Analyst® designation, a CDFAs® must obtain fifteen divorce-related hours of Continuing Education (CE) every two years, remain in good standing with the IDFATM, and keep his/her dues current.

To learn more about the CDFAs® designation, visit [http:// www.institutedfa.com/](http://www.institutedfa.com/).

3. Disciplinary Information

None.

4. Other Business Activities

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. Licensed Insurance Agent

Ms. Kane, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Ms. Kane to purchase insurance products on a commission basis.

Conflict of Interest: The recommendation by Ms. Kane that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Ms. Kane. Clients are reminded that they may purchase insurance products recommended by Ms. Kane through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Sheryl Stephens, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

5. Additional Compensation

Ms. Kane's annual compensation is based, in part, on the amount of assets under management and the number of clients that Ms. Kane introduces to the Registrant. Accordingly, Ms. Kane has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

6. Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Sheryl Stephens, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Stephens at (810) 732-7411.

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1. Cover Page

Melissa Alice Fradenburg

Pearl Planning, LLC

ADV Part 2B, Brochure Supplement

Dated: January 21, 2022

Contact: Sheryl Stephens, Chief Compliance Officer
5206 Gateway Centre, Suite 300
Flint, Michigan 48507

This Brochure Supplement provides information about Melissa Alice Fradenburg that supplements the Pearl Planning, LLC Brochure; you should have received a copy of that Brochure. Please contact Sheryl Stephens, Chief Compliance Officer, if you did not receive Pearl Planning's Brochure or if you have any questions about the contents of this supplement.

Additional information about Melissa Alice Fradenburg is available on the SEC's website at www.adviserinfo.sec.gov.

2. Education Background and Business Experience

Melissa Alice Fradenburg was born in 1979. Ms. Fradenburg graduated from Gettysburg College in 2001 a Bachelor of Arts degree in economics. Ms. Fradenburg has been employed as a financial advisor of Pearl Planning, LLC since October of 2021. From October of 2017 to October of 2021, Ms. Fradenburg was an investment advisor representative of Raymond James Financial Services Advisors, Inc. From November of 2019 to October of 2021 and from February of 2017 to December of 2018, she was a financial advisor of Raymond James Financial Services, Inc. From January of 2019 to October of 2019, she was a wealth advisor of Lakeshore Financial Planning Inc.

3. Disciplinary Information

None.

4. Other Business Activities

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.**
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.**

5. Additional Compensation

Ms. Fradenburg's annual compensation is based, in part, on the amount of assets under management and the number of clients that Ms. Fradenburg introduces to the Registrant. Accordingly, Ms. Fradenburg has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

6. Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Sheryl Stephens, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Stephens at (810) 732-7411.

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1. Cover Page

Melissa Nicole Joy

Pearl Planning, LLC

ADV Part 2B, Brochure Supplement

Dated: January 21, 2022

Contact: Sheryl Stephens, Chief Compliance Officer
5206 Gateway Centre, Suite 300
Flint, Michigan 48507

This Brochure Supplement provides information about Melissa Nicole Joy that supplements the Pearl Planning, LLC Brochure; you should have received a copy of that Brochure. Please contact Sheryl Stephens, Chief Compliance Officer, if you did not receive Pearl Planning's Brochure or if you have any questions about the contents of this supplement.

Additional information about Melissa Nicole Joy is available on the SEC's website at www.adviserinfo.sec.gov.

2. Education Background and Business Experience

Melissa Nicole Joy was born in 1975. Ms. Joy graduated from The University of Michigan in 2010 with a Bachelor of Arts degree in political science. Ms. Joy has been employed as a financial advisor of Pearl Planning, LLC since October of 2021. From July of 2018 to October of 2021, Ms. Joy was an investment advisor representative of Raymond James Financial Services Advisors, Inc. From July of 1998 to October of 2021, she was a financial advisor of Raymond James Financial Services, Inc. From August of 1999 to August of 2018, she was a partner and financial advisor of the Center for Financial Planning.

Ms. Joy has been a CERTIFIED FINANCIAL PLANNER™ professional since 2012. Certified Financial Planner Board of Standards, Inc. ("CFP Board") owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the "CFP® marks"). The CFP Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board's initial and ongoing certification requirements.

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Ms. Joy has held the designation of Certified Divorce Financial Analyst® (C DFA®) since 2016. The Certified Divorce Financial Analyst® (CDFA®) designation is issued by The Institute for Divorce Financial Analysts (IDFATM), which is a national organization dedicated to the certification, education, and promotion of the use of financial professionals in the divorce arena.

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- Financial and legal issues of divorce
- Advanced financial issues of divorce
- Tax issues of divorce
- Working as a CDFAs: case studies

Continuing Education (CE)

To retain the Certified Divorce Financial Analyst® designation, a CDFAs® must obtain fifteen divorce-related hours of Continuing Education (CE) every two years, remain in good standing with the IDFATM, and keep his/ her dues current.

To learn more about the CDFAs® designation, visit [http:// www.instituted fa.com/](http://www.institutedfa.com/).

3. Disciplinary Information

None.

4. Other Business Activities

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. Licensed Insurance Agent

Ms. Joy, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Ms. Joy to purchase insurance products on a commission basis.

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Conflict of Interest: The recommendation by Ms. Joy that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Ms. Joy. Clients are reminded that they may purchase insurance products recommended by Ms. Joy through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Sheryl Stephens, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

5. Additional Compensation

Ms. Joy's annual compensation is based, in part, on the amount of assets under management and the number of clients that Ms. Joy Accordingly, Ms. Joy has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

6. Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Sheryl Stephens, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Stephens at (810) 732-7411.

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Hannah Elizabeth Near

Pearl Planning, LLC

ADV Part 2B, Brochure Supplement

Dated: January 21, 2022

Contact: Sheryl Stephens, Chief Compliance Officer
5206 Gateway Centre, Suite 300
Flint, Michigan 48507

This Brochure Supplement provides information about Hannah Elizabeth Near that supplements the Pearl Planning, LLC Brochure; you should have received a copy of that Brochure. Please contact Sheryl Stephens, Chief Compliance Officer, if you did not receive Pearl Planning's Brochure or if you have any questions about the contents of this supplement.

Additional information about Hannah Elizabeth Near is available on the SEC's website at www.adviserinfo.sec.gov.

2. Education Background and Business Experience

Hannah Elizabeth Near was born in 1992. Ms. Near graduated from Saginaw Valley State University in 2013 with a Bachelor of Business Administration degree, and from The College of William and Mary in 2014 with a Master of Accounting degree. Ms. Near has been employed as an associate financial advisor and relationship manager of Pearl Planning, LLC since October of 2021. From September of 2021 to October of 2021, Ms. Near was an investment advisor representative of Raymond James Financial Services Advisors, Inc. and a registered representative of Raymond James Financial Services, Inc. Ms. Near was a financial advisor of Edward Jones from March of 2019 to August of 2021 and from October of 2015 to May of 2017. From July of 2018 to July of 2019, Ms. Near was a driver with Lyft. From May of 2017 to October of 2018, she was a financial consultant of MJ Smith & Associates and of Raymond James Financial Services, Inc.

Ms. Near has been a CERTIFIED FINANCIAL PLANNER™ professional since 2018. Certified Financial Planner Board of Standards, Inc. ("CFP Board") owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the "CFP® marks"). The CFP Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board's initial and ongoing certification requirements.

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- Ethics - Agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct*, which put clients' interest first; acknowledge CFP Board's right to enforce them through its *Disciplinary Rules and Procedures*; comply with the *Financial Planning Practice Standards* which determine what clients should reasonably expect from the financial planning engagement and complete a CFP® Certification Application which requires disclosure of an individual's background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by the individual's employer or firm.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

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- Ethics - CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board's Code of Ethics and Standards of Conduct and to acknowledge CFP Board's right to enforce them through its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP® professionals provide financial planning services in the best interests of their clients.

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Ms. Near has held the designation of Certified Public Accountant ("CPA") since 2015. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college [education](#) (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum [experience](#) levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own. In addition to the *Code of Professional Conduct*, AICPA members who provide personal financial planning services are required to follow the *Statement on Standards in Personal Financial Planning Services* (SSPFPS).

3. Disciplinary Information

None.

4. Other Business Activities

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. Licensed Insurance Agent

Ms. Near, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Ms. Near to purchase insurance products on a commission basis.

Conflict of Interest: The recommendation by Ms. Near that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Ms. Near. Clients are reminded that they may purchase insurance products recommended by Ms. Near through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Sheryl Stephens, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

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5. Additional Compensation

None.

6. Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Sheryl Stephens, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Stephens at (810) 732-7411.

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1. Cover Page

Jacqueline Beth Roessler

Pearl Planning, LLC

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Dated: January 21, 2022

Contact: Sheryl Stephens, Chief Compliance
Officer 5206 Gateway Centre, Suite 300
Flint, Michigan 48507

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Additional information about Jacqueline Beth Roessler is available on the SEC's website at www.adviserinfo.sec.gov.

2. Education Background and Business Experience

Jacqueline Beth Roessler was born in 1969. Ms. Roessler earned a diploma from Berkley High School in 1987. Ms. Roessler has been employed as a divorce financial planner of Pearl Planning, LLC since January of 2022. Ms. Roessler has also been the owner of Divorce Axis, LLC since January of 2019. From October of 2017 to January of 2022, Ms. Roessler was a divorce financial planner of Center for Financial Planning, Inc. Ms. Roessler was employed by The Institute for Divorce Financial Analysts as an instructor from January of 201 to November of 2020 and as a writer editor from January of 2020 to December of 2020. From September of 2017 to December of 2019, she was a sales employee of Family Law Software.

Ms. Roessler has held the designation of Certified Divorce Financial Analyst® (CDFA®) since 1996. The Certified Divorce Financial Analyst® (CDFA®) designation is issued by The Institute for Divorce Financial Analysts (IDFATM), which is a national organization dedicated to the certification, education, and promotion of the use of financial professionals in the divorce arena.

Founded in 1993, IDFATM provides specialized training to accounting, financial, and legal professionals in the field of pre-divorce financial planning. Over the years, IDFATM has certified more than 5,000 professionals in the U.S. and Canada as Certified Divorce Financial Analysts® (CDFAs®). The CDFA® designation is available to individuals who have a minimum of three years experience as a financial professional, accountant, or matrimonial lawyer. To acquire the designation, a candidate must successfully pass all exams and be in good standing with their broker dealer (if applicable) and the FINRA/SEC or other licensing or regulatory agency.

To earn the designation, the participant must complete a series of self-study course modules and pass an examination for each module. The American module topics are:

- Financial and legal issues of divorce
- Advanced financial issues of divorce
- Tax issues of divorce
- Working as a CDFA: case studies

Continuing Education (CE)

To retain the Certified Divorce Financial Analyst® designation, a CDFA® must obtain fifteen divorce-related hours of Continuing Education (CE) every two years, remain in good standing with the IDFATM, and keep his/her dues current.

To learn more about the CDFA® designation, visit <http://www.institutedfa.com/>.

3. Disciplinary Information

None.

4. Other Business Activities

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

Form ADV Part 2B: Disclosure Brochure Supplement



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5. Additional Compensation

Ms. Roessler's annual compensation is based, in part, on the amount of assets under management and the number of clients that Ms. Roessler introduces to the Registrant. Accordingly, Ms. Roessler has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

6. Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Sheryl Stephens, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Stephens at (810) 732-7411.