

No Grit. No Pearl.'"

1. Cover Page

Alexa Jo Kane

Pearl Planning, LLC

ADV Part 2B, Brochure Supplement Dated: March 6, 2024

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 <u>www.adviserinfo.sec.gov.</u>



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 is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER[™] professional or a CFP[®] professional, and she may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at www.cfp.net.

CFP[®] professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP[®] professional, an individual must fulfill the following requirements:

- Education Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP[®] professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- Examination Pass the comprehensive CFP[®] Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics Satisfy the Fitness Standards for Candidates for CFP[®] Certification and Former CFP[®] Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of
 the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial
 advice and financial planning. CFP Board may sanction a CFP[®] professional who does not abide by this commitment, but
 CFP Board does not guarantee a CFP[®] professional's services. A client who seeks a similar commitment should obtain a
 written engagement that includes a fiduciary obligation to the client.
- Continuing Education Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

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 (IDFA[™]), which is a national organization dedicated to the certification, education, and promotion of the use of financial professionals in the divorce arena.



No Grit. No Pearl."

Founded in 1993, IDFA[™] 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 orother licensing or regulatory agency.

There are currently four methods of pursuing the CDFA[®] certification, all culminating in an examination consisting of 150 multiple-choice questions. To retain the Certified Divorce Financial Analyst[®] certification, a CDFA[®] certificant must obtain thirty divorce-related hours of continuing education every two years, remain in good standing with the IDFA[™], and keep his/her dues current. To learn more about the CDFA[®] certification, visit http://www.institutedfa.com/.

Ms. Kane became an Accredited Investment Fiduciary[®] (AIF[®]) Designee in 2022. The AIF Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF Designation, the individual must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the Code of Ethics and Conduct Standards. In order to maintain the AIF Designation, the individual must annually attest to the Code of Ethics and Conduct Standards, and accrue and report a minimum of six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.

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. 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



No Grit. No Pearl.'"

1. Cover Page

Melissa Nicole Joy

Pearl Planning, LLC

ADV Part 2B, Brochure Supplement Dated: March 6, 2024

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 <u>www.adviserinfo.sec.gov.</u>



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 is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER[™] professional or a CFP[®] professional, and she may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at www.cfp.net.

CFP[®] professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP[®] professional, an individual must fulfill the following requirements:

- Education Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP[®] professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- Examination Pass the comprehensive CFP[®] Certification Examination. The examination is designed to assess an
 individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial
 planning situations.
- **Experience** Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics Satisfy the Fitness Standards for Candidates for CFP[®] Certification and Former CFP[®] Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of
 the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial
 advice and financial planning. CFP Board may sanction a CFP[®] professional who does not abide by this commitment, but
 CFP Board does not guarantee a CFP[®] professional's services. A client who seeks a similar commitment should obtain a
 written engagement that includes a fiduciary obligation to the client.
- Continuing Education Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Ms. Joy has held the designation of Certified Divorce Financial Analyst[®] (CDFA[®]) 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.



Founded in 1993, IDFA[™] 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.

There are currently four methods of pursuing the CDFA[®] certification, all culminating in an examination consisting of 150 multiple-choice questions. To retain the Certified Divorce Financial Analyst® certification, a CDFA[®] certificant must obtain thirty divorce-related hours of continuing education every two years, remain in good standing with the IDFA[™], and keep his/her dues current. To learn more about the CDFA[®] certification, 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. Licensed Insurance Agent

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

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



No Grit. No Pearl.'"

1. Cover Page

Tonia-Marie Wander

Pearl Planning, LLC

ADV Part 2B, Brochure Supplement Dated: March 6, 2024

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

This Brochure Supplement provides information about Tonia-Marie Wander 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 Tonia-Marie Wander is available on the SEC's website at <u>www.adviserinfo.sec.gov.</u>



2. Education Background and Business Experience

Tonia-Marie Wander was born in 1962. Ms. Wander graduated from the University of Michigan in 1988 with a Bachelor of Arts degree in philosophy, and from Eastern Michigan University in 1998 with a Master of Accounting degree. Ms. Wander has been employed as a financial advisor of Pearl Planning, LLC since January of 2023. From February of 2019 to January of 2023, Ms. Wander was a financial advisor of Legacy Wealth Planning. From February of 2014 to February of 2019, she was a financial advisor Old National Bank.

Ms. Wander is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER[™] professional or a CFP[®] professional, and she may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at www.cfp.net.

CFP[®] professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP[®] professional, an individual must fulfill the following requirements:

- Education Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP[®] professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- Examination Pass the comprehensive CFP[®] Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics Satisfy the Fitness Standards for Candidates for CFP[®] Certification and Former CFP[®] Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of
 the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial
 advice and financial planning. CFP Board may sanction a CFP[®] professional who does not abide by this commitment, but
 CFP Board does not guarantee a CFP[®] professional's services. A client who seeks a similar commitment should obtain a
 written engagement that includes a fiduciary obligation to the client.
- Continuing Education Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Ms. Wander has held the Certified Investment Management Analyst[®] designation since 2006. The CIMA[®] certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. The designation is administered through the Investments & Wealth Institute[®]. Prerequisites for the CIMA[®] certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA[®] certification, candidates must



No Grit. No Pearl."

complete an executive education program through a registered education provider and pass a comprehensive certification exam. CIMA[®] designees are required to adhere to the Investments & Wealth Institute's[®] Code of Professional Responsibility and the appropriate use of the certification marks. CIMA[®] designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification.

Ms. Wander has held the designation of Chartered SRI CounselorSM (CSRIC[®]) since 2020. The CSRIC[®] designation is a graduate-level program for advanced financial planners and is awarded by the College for Financial Planning[®]. The CSRIC[®] program provides a blend of foundational knowledge and scenario learning to work with sustainable, responsible, and impact (SRI) investments for a variety of clients. The program includes seven modules and candidates must pass a final examination. To maintain the CSRIC[®] designation, individuals are required to complete 16 hours of continuing education every two years.

Ms. Wander has held the designation of Certified Public Accountant ("CPA") since 2000. 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. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

5. Additional Compensation

Ms. Wander's annual compensation is based, in part, on the amount of assets under management and the number of clients that Ms. Wander introduces to the Registrant. Accordingly, Ms. Wander 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.



No Grit. No Pearl."

6. Supervision



No Grit. No Pearl."

1. Cover Page

Lucy Elizabeth Valandra

Pearl Planning, LLC

ADV Part 2B, Brochure Supplement Dated: March 6, 2024

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

This Brochure Supplement provides information about Lucy Elizabeth Valandra 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 Lucy Elizabeth Valandra is available on the SEC's website at <u>www.adviserinfo.sec.gov.</u>



2. Education Background and Business Experience

Lucy Elizabeth Valandra was born in 1992. Ms. Valandra graduated from Sweet Briar College in 2014 with a Bachelor of Arts degree in business. Ms. Valandra has been employed as a Financial Advisor of Pearl Planning, LLC since February of 2024. From October of 2018 to January of 2024, Ms. Valandra was employed by Meridian Financial Partners, where she served as the Director of Client Experience (October 2018-November 2020), Associate Financial Advisor (November 2020-January 2023), and Lead Financial Advisor (January 2023-January 2024).

Ms. Valandra is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER[™] professional or a CFP[®] professional, and she may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at www.cfp.net.

CFP[®] professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP[®] professional, an individual must fulfill the following requirements:

- Education Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP[®] professional who first became certified before those dates may not have earned a bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP[®] professional who first became certified before those dates may not have earned a bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP[®] professional who first became certified before those dates may not have earned a bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP[®] professional who first became certified before those dates may not have earned a bachelor's degree or completed a financial planning development capstone course requirement in March 2012. Therefore, a CFP[®] professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- Examination Pass the comprehensive CFP[®] Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics Satisfy the Fitness Standards for Candidates for CFP[®] Certification and Former CFP[®] Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of
 the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial
 advice and financial planning. CFP Board may sanction a CFP[®] professional who does not abide by this commitment, but
 CFP Board does not guarantee a CFP[®] professional's services. A client who seeks a similar commitment should obtain a
 written engagement that includes a fiduciary obligation to the client.
- Continuing Education Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.



No Grit. No Pearl."

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. Valandra's annual compensation is based, in part, on the number of clients that Ms. Valandra introduces to the Registrant. Accordingly, Ms. Valandra 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