

**1. Cover Page**

**Jason Alan Guenther**

Stephens Wealth Management Group

ADV Part 2B, Brochure Supplement

Dated: May 3, 2022

Contact: Sheryl Stephens, Chief Compliance Officer

5206 Gateway Centre, Suite 300  
Flint, Michigan 48507

**This Brochure Supplement provides information about Jason Alan Guenther that supplements the Stephens Wealth Management Group Brochure; you should have received a copy of that Brochure. Please contact Sheryl Stephens, Chief Compliance Officer, if you did *not* receive Stephens Wealth Management Group's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Jason Alan Guenther is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## 2. Education Background and Business Experience

Jason Alan Guenther was born in 1975. Mr. Guenther graduated from Michigan State University in 1998 with a Bachelor of Science degree in psychology and in 2000 with a Bachelor of Arts degree in finance. Mr. Guenther has been employed as a financial advisor of Stephens Wealth Management Group since October of 2021. From June of 2012 to October of 2021, Mr. Guenther was an investment advisor representative of Raymond James Financial Services Advisors, Inc. From April of 2012 to October of 2021, he was a financial advisor of Raymond James Financial Services, Inc.

Mr. Guenther is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he 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](http://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.
- **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.

## 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**

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

**Conflict of Interest:** The recommendation by Mr. Guenther 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 Mr. Guenther. Clients are reminded that they may purchase insurance products recommended by Mr. Guenther 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**

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

**1. Cover Page**

**Jill Raeanne Carr**

Stephens Wealth Management Group

ADV Part 2B, Brochure Supplement  
Dated: May 3, 2022

Contact: Sheryl Stephens, Chief Compliance

Officer 5206 Gateway Centre, Suite 300  
Flint, Michigan 48507

**This Brochure Supplement provides information about Jill Raeanne Carr that supplements the Stephens Wealth Management Group Brochure; you should have received a copy of that Brochure. Please contact Sheryl Stephens, Chief Compliance Officer, if you did *not* receive Stephens Wealth Management Group's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Jill Raeanne Carr is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## 2. Education Background and Business Experience

Jill Raeane Carr was born in 1977. Ms. Carr graduated from Michigan Technological University in 2000 with a Bachelor of Science degree in scientific and technical communication, and from the University of Michigan–Flint in 2005 with a Bachelor of Arts Degree in accounting. Ms. Carr has been employed as a financial advisor of Stephens Wealth Management Group since October of 2021. From January of 2017 to October of 2021, Ms. Carr was an investment advisor representative of Raymond James Financial Services Advisors, Inc. From August of 2016 to October of 2021, she was a financial advisor of Raymond James Financial Services, Inc., and a client service representative from November of 2015 to August of 2016.

Ms. Carr 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](http://www.cfp.net).

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- **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.

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- **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. Carr has held the designation of Certified Public Accountant (“CPA”) since 2007. 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 (SSFPFS).

### 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. Certified Public Accountant (CPA)

Ms. Carr, in her individual capacity, is a certified public accountant, and may recommend her tax preparation and/or accounting services. To the extent a client determines to engage Ms. Carr to provide tax preparation and/or accounting services, such services shall be provided by Ms. Carr in her individual capacity as a certified public accountant, independent of Registrant. Registrant shall receive no portion of fees charged by Ms. Carr for such services.

**Conflict of Interest:** The recommendation by Ms. Carr that a client elect her accounting services presents a conflict of interest, as the receipt of fees for accounting services may provide an incentive to recommend such services, rather than recommending such services based upon a particular client's needs. No client is under any obligation to utilize Ms. Carr for accounting services. Clients are reminded that they may elect to obtain accounting services recommended by the Registrant through other non-affiliated certified public accountants. **The Registrant's Chief Compliance Officer, Sheryl Stephens remains available to address any questions that a client or prospective may have regarding the above conflict of interest.**

### 5. Additional Compensation

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

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**1. Cover Page**

**Sheryl Elaine Stephens**

Stephens Wealth Management Group

ADV Part 2B, Brochure Supplement  
Dated: May 3, 2022

Contact: Sheryl Stephens, Chief Compliance Officer

5206 Gateway Centre, Suite 300  
Flint, Michigan 48507

**This Brochure Supplement provides information about Sheryl Elaine Stephens that supplements the Stephens Wealth Management Group Brochure; you should have received a copy of that Brochure. Please contact Sheryl Stephens, Chief Compliance Officer, if you did *not* receive Stephens Wealth Management Group's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Sheryl Elaine Stephens is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



## 2. Education Background and Business Experience

Sheryl Elaine Stephens was born in 1957. Ms. Stephens graduated from The University of Michigan–Flint in 1980 with a Bachelor of Business Administration degree. Ms. Stephens has been President, Chief Compliance Officer, and a financial advisor of Stephens Wealth Management Group since October of 2021. From August of 2010 to October of 2021, Ms. Stephens was an investment advisor representative of Raymond James Financial Services Advisors, Inc. From June of 1977 to October of 2021, she was a financial advisor of Raymond James Financial Services, 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. Licensed Insurance Agent

Ms. Stephens, 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. Stephens to purchase insurance products on a commission basis.

**Conflict of Interest:** The recommendation by Ms. Stephens 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. Stephens. Clients are reminded that they may purchase insurance products recommended by Ms. Stephens 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. Stephens' annual compensation is based, in part, on the amount of assets under management and the number of clients that Ms. Stephens introduces to the Registrant. Accordingly, Ms. Stephens 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

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**1. Cover Page**

**Victoria Adair Boswell**

Stephens Wealth Management Group

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Dated: May 3, 2022

Contact: Sheryl Stephens, Chief Compliance Officer

5206 Gateway Centre, Suite 300  
Flint, Michigan 48507

**This Brochure Supplement provides information about Victoria Adair Boswell that supplements the Stephens Wealth Management Group Brochure; you should have received a copy of that Brochure. Please contact Sheryl Stephens, Chief Compliance Officer, if you did *not* receive Stephens Wealth Management Group's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Victoria Adair Boswell is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### 2. Education Background and Business Experience

Victoria Adair Boswell was born in 1962. Ms. Boswell graduated from The University of Alabama in 1984 with a Bachelor of Science degree in accounting, and from the University of South Florida in 1987 with a Master of Business Administration degree. Ms. Boswell has been employed as a financial advisor of Stephens Wealth Management Group since October of 2021. From August of 2013 to October of 2021, Ms. Boswell was an investment advisor representative of Raymond James Financial Services Advisors, Inc. From June of 2013 to October of 2021, she was a financial advisor of Raymond James Financial Services, Inc.

Ms. Boswell has held the Certified Investment Management Analyst® designation since 2001. 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 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.

### 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. Boswell, 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. Boswell to purchase insurance products on a commission basis.

**Conflict of Interest:** The recommendation by Ms. Boswell 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. Boswell. Clients are reminded that they may purchase insurance products recommended by Ms. Boswell 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. Boswell's annual compensation is based, in part, on the amount of assets under management and the number of clients that Ms. Boswell introduces to the Registrant. Accordingly, Ms. Boswell 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**

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**1. Cover Page**

**Tyler Joel Stephens**

Stephens Wealth Management Group

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Dated: May 3, 2022

Contact: Sheryl Stephens, Chief Compliance Officer

5206 Gateway Centre, Suite 300  
Flint, Michigan 48507

**This Brochure Supplement provides information about Tyler Joel Stephens that supplements the Stephens Wealth Management Group Brochure; you should have received a copy of that Brochure. Please contact Sheryl Stephens, Chief Compliance Officer, if you did *not* receive Stephens Wealth Management Group's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Tyler Joel Stephens is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## 2. Education Background and Business Experience

Tyler Joel Stephens was born in 1986. Mr. Stephens graduated from The University of Michigan–Flint in 2009 with a Bachelor of Business Administration degree in finance. Mr. Stephens has been employed as a financial advisor of Stephens Wealth Management Group since October of 2021. From September of 2019 to October of 2021, Mr. Stephens was an investment advisor representative of Raymond James Financial Services Advisors, Inc. and a financial adviser of Raymond James Financial Services, Inc. From December of 2015 to September of 2019, he was a registered representative of Securities America.

## 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

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

**Conflict of Interest:** The recommendation by Mr. Stephens 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 Mr. Stephens. Clients are reminded that they may purchase insurance products recommended by Mr. Stephens 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

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

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**1. Cover Page**

**Jessica Erin Stirling**

Stephens Wealth Management Group

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Dated: May 3, 2022

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

**This Brochure Supplement provides information about Jessica Erin Stirling that supplements the Stephens Wealth Management Group Brochure; you should have received a copy of that Brochure. Please contact Sheryl Stephens, Chief Compliance Officer, if you did *not* receive Stephens Wealth Management Group's Brochure or if you have any questions about the contents of this supplement.**

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### 2. Education Background and Business Experience

Jessica Erin Stirling was born in 1993. Ms. Stirling graduated from The University of Michigan in 2015 with a Bachelor of Science degree in actuarial mathematics. Ms. Stirling has been employed as an investment analyst and support advisor of Stephens Wealth Management Group since October of 2021. From September of 2021 to October of 2021, Ms. Stirling was an investment advisor representative of Raymond James Financial Services Advisors, Inc. and a financial advisor of Raymond James Financial Services, Inc. Ms. Stirling was previously employed by Wells Fargo Advisors as an associate financial advisor from June of 2015 to March of 2018, and as a financial consultant from March of 2018 to August of 2021.

### 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. Stirling, 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. Stirling to purchase insurance products on a commission basis.

**Conflict of Interest:** The recommendation by Ms. Stirling 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. Stirling. Clients are reminded that they may purchase insurance products recommended by Ms. Stirling 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. Stirling's annual compensation is based, in part, on the amount of assets under management and the number of clients that Ms. Stirling introduces to the Registrant. Accordingly, Ms. Stirling 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.

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**Douglas Gregg Marlow**

Stephens Wealth Management Group

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Dated: May 3, 2022

Contact: Sheryl Stephens, Chief Compliance Officer

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**This Brochure Supplement provides information about Douglas Gregg Marlow that supplements the Stephens Wealth Management Group Brochure; you should have received a copy of that Brochure. Please contact Sheryl Stephens, Chief Compliance Officer, if you did *not* receive Stephens Wealth Management Group's Brochure or if you have any questions about the contents of this supplement.**

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### 2. Education Background and Business Experience

Douglas Gregg Marlow was born in 1964. Mr. Marlow graduated from the University of Phoenix in 2001 with a Bachelor of Science degree in business management. Mr. Marlow has been employed as Director of Financial Planning of Stephens Wealth Management Group since April of 2022. From April of 2021 to April of 2022, Mr. Marlow was a Senior Wealth Advisor of Ally Invest Advisors. From June of 2019 to March of 2020, he was the Vice President of Regional Planning for Fidelity Personal and Workplace Advisors. From February of 2018 to June of 2019, Mr. Marlow was a High Net Worth Advisor of Cuso Financial Services, LP. From March of 2020 to April of 2021 and from April of 2017 to February of 2018, he was the owner of Upticks Coaching.

Mr. Marlow is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he 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](http://www.cfp.net).

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- **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.

Mr. Marlow has held the designation of Chartered Financial Consultant (ChFC®) since 1994. The ChFC® designation is awarded by The American College, an accredited private educational institution that offers both undergraduate and graduate training programs. Prerequisites include high school education and three years of full-time business experience within the five years preceding the awarding of the designation. Average study time to earn the ChFC® exceeds 450 hours, to complete the 8 required college-level courses and pass the final exam for each course. Required courses cover topics, including retirement and estate planning; insurance planning; financial process and environment, income tax planning; employee benefits planning; asset protection planning and estate tax, transfer tax, and gift tax planning; and applications of comprehensive financial planning and

consulting. Certification requires 30 CE credits every two years. ChFC® charterholders are held to a fiduciary standard and agree to comply with The American College code of ethics and procedures.

Mr. Marlow 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.

Mr. Marlow has held the designation of Chartered Life Underwriter (CLU®) since 1994. Since 1927, the CLU® has been the respected risk management credential for advisors. Designees have completed eight or more college-level courses representing an average study time of 400 hours. Topics for required courses include insurance and financial planning, life insurance law, estate planning, and planning for business owners and professionals. Elective courses include such advanced topics as income taxes, group benefits, retirement planning, and health insurance. CLU® designees must meet experience and continuing education requirements and must adhere to a high ethical standard. The mark is awarded by The American College, a non-profit educator with the top level of academic accreditation.

### 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

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

**Conflict of Interest:** The recommendation by Mr. Marlow 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 Mr. Marlow. Clients are reminded that they may purchase insurance products recommended by Mr. Marlow 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

Mr. Marlow's annual compensation is based, in part, on the amount of assets under management that Mr. Marlow introduces to the Registrant. Accordingly, Mr. Marlow 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



## FORM ADV PART 2B: DISCLOSURE BROCHURE SUPPLEMENT



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.