

1. Cover Page

Jason Alan Guenther

Stephens Wealth Management Group

ADV Part 2B, Brochure Supplement

Dated: February 16, 2024

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.

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.

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.

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 promoter 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: February 16, 2024

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.

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.

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. 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 (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. 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

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 promoter 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

Sheryl Elaine Stephens

Stephens Wealth Management Group

ADV Part 2B, Brochure Supplement
Dated: February 16, 2024

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.

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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Contact: Sheryl Stephens, Chief Compliance Officer

5206 Gateway Centre, Suite 300
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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.

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

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 promoter 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

Tyler Joel Stephens

Stephens Wealth Management Group

ADV Part 2B, Brochure Supplement
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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.

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.

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 promoter 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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Jessica Erin Schlanderer

Stephens Wealth Management Group

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Additional information about Jessica Erin Schlanderer is available on the SEC's website at www.adviserinfo.sec.gov.

2. Education Background and Business Experience

Jessica Erin Schlanderer was born in 1993. Ms. Schlanderer graduated from The University of Michigan in 2015 with a Bachelor of Science degree in actuarial mathematics. Ms. Schlanderer 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. Schlanderer was an investment advisor representative of Raymond James Financial Services Advisors, Inc. and a financial advisor of Raymond James Financial Services, Inc. Ms. Schlanderer 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. Schlanderer, 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. Schlanderer to purchase insurance products on a commission basis.

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