



ADV Part 2 – Summary of Material Changes

Below is the material change to our brochure since our last updates of March 30, 2021:

1. June 15, 2023 – Item 4 – Added language to include Model Portfolio delivery.
2. June 15, 2023 – Item 5 – Added model delivery fees.
3. June 15, 2023 – Item 7 – Added model delivery language.
4. June 15, 2023 – Item 17 -Added model portfolio delivery language.
5. Item 4 – Updated advisory business and fixed income process narrative.
6. Item 5 – clarified valuation methodology in relation to fees and removed performance-based fee language.
7. Item 6 – remove performance-based fee language.
8. Item 11 – updated language.
9. Item 14 – Updated language for new marketing rule (November 2022).
Removed language pertaining to databases.
10. Item 15 – Removed excessive language.