

To prepare your firm's Form ADV Annual Amendment filing we are sending this questionnaire that you will need to complete and return as soon as possible. **Please note the 2022 Form ADV Annual Amendment fixed fee service covers only the items included in this questionnaire.**

Any additional requested changes to your firm's Form ADV Part 1, Part 2A, Part 2A Appendix 1, Part 2B and Form U4s/U5s will be (1) applied against As-Needed Consulting Hours you may have available under an annual RCC compliance program or (2) billed separately at our normal hourly fee rates subject to our standard fixed fee schedule depending on the service requested.

Regulatory Assets Under Management (Regulatory AUM) and other answers must be compiled using a date within 90 days prior to filing this Form ADV Annual Amendment. Therefore, you do not need to use values as of December 31, 2021, but may choose another date in October, November or December so long as the Annual Amendment is submitted within 90 days from the date you calculate your Regulatory AUM and submitted after your fiscal year end.

For example: Regulatory AUM calculated on: **December 31st, 2021**

Form ADV Annual Amendment needs to be submitted by: **March 31, 2021**

#1 Firm Identifying Information

1. A) FIRM NAME:

1. B) TOTAL NUMBER OF EMPLOYEES:

- *For purposes of Form ADV reporting, "employee" includes: owners; independent contractors providing investment advice on behalf of the firm and are supervised persons for purposes of your firm's compliance policies and procedures.*
- *You are not required to include clerical staff.*

1. C) INDICATE THE NUMBER OF EMPLOYEES THAT (ARE):

Perform investment advisory functions:

Registered representatives of a broker dealer:

Registered as investment adviser representative:

Registered as investment adviser representative with an investment adviser firm other than your firm:

Licensed agents of an insurance company or agency:

Outside Solicitors: Number of firms or other persons that solicit advisory clients to your firm?

- *Do not count any of your firm's employees and count a firm only once*
- *Do not count each of the firm's employees that solicit on your behalf*

#1 Firm Identifying Information (cont.)

1. D) WEBSITE AND SOCIAL MEDIA ACCOUNT(S):

Does your firm have a website or social media account(s)? Please select one answer

If you answered yes, list all firm website addresses (including websites currently reported on the firm's Form ADV Part 1) and the complete address for each of the firm's accounts on publicly available social media platforms or indicate your firm does not have a website or social media account(s). Do not provide the addresses of websites or accounts on publicly available social media platforms where you do not control the content. Do not provide the individual electronic email addresses of employees or the addresses of employee accounts on publicly available social media platforms:

Complete Address of Website/Account on Publicly Available Social Media Platform:

Complete Address of Website/Account on Publicly Available Social Media Platform:

Complete Address of Website/Account on Publicly Available Social Media Platform:

Complete Address of Website/Account on Publicly Available Social Media Platform:

Complete Address of Website/Account on Publicly Available Social Media Platform:

1. E) OTHER OFFICE LOCATION(S):

Does your firm have an office other than the principal office and place of business? Please select one answer

If you answered yes, please complete the following information.

OTHER OFFICE LOCATION #1:

Is the address below a private residence? Select:

Insert Telephone Number

Insert Full Address (Street, City, State, Zip Code) Type in the bar

Insert Facsimile Number

If this office location is also required to be registered with FINRA or a state securities authority as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR). Provide CRD Branch Number

How many employees perform investment advisory functions from this office location?

Are other business activities conducted at this location? (Check all that apply)

(1) Broker-dealer (registered and unregistered)

(5) Registered municipal advisor

(2) Bank (including a separately identifiable department or division of a bank)

(6) Accountant or accounting firm

(3) Insurance broker or agent

(7) Lawyer or law firm

(4) Commodity pool operator or commodity trading advisor (whether registered or Exempt from registration)

(8) Other

#1 Firm Identifying Information (cont.)

OTHER OFFICE LOCATION #2:

Is the address below a private residence? Select:

Insert Telephone Number

Insert Full Address (Street, City, State, Zip Code) Type in the bar

Insert Facsimile Number

If this office location is also required to be registered with FINRA or a state securities authority as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR). Provide CRD Branch Number

How many employees perform investment advisory functions from this office location?

Are other business activities conducted at this location? (Check all that apply)

- | | |
|--|--|
| <input type="checkbox"/> (1) Broker-dealer (registered and unregistered) | <input type="checkbox"/> (5) Registered municipal advisor |
| <input type="checkbox"/> (2) Bank (including a separately identifiable department or division of a bank) | <input type="checkbox"/> (6) Accountant or accounting firm |
| <input type="checkbox"/> (3) Insurance broker or agent | <input type="checkbox"/> (7) Lawyer or law firm |
| <input type="checkbox"/> (4) Commodity pool operator or commodity trading advisor (whether registered or Exempt from registration) | <input type="checkbox"/> (8) Other |

OTHER OFFICE LOCATION #3:

Is the address below a private residence? Select:

Insert Telephone Number

Insert Full Address (Street, City, State, Zip Code) Type in the bar

Insert Facsimile Number

If this office location is also required to be registered with FINRA or a state securities authority as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR). Provide CRD Branch Number

How many employees perform investment advisory functions from this office location?

Are other business activities conducted at this location? (Check all that apply)

- | | |
|--|--|
| <input type="checkbox"/> (1) Broker-dealer (registered and unregistered) | <input type="checkbox"/> (5) Registered municipal advisor |
| <input type="checkbox"/> (2) Bank (including a separately identifiable department or division of a bank) | <input type="checkbox"/> (6) Accountant or accounting firm |
| <input type="checkbox"/> (3) Insurance broker or agent | <input type="checkbox"/> (7) Lawyer or law firm |
| <input type="checkbox"/> (4) Commodity pool operator or commodity trading advisor (whether registered or Exempt from registration) | <input type="checkbox"/> (8) Other |

#1 Firm Identifying Information (cont.)

OTHER OFFICE LOCATION #4:

Is the address below a private residence? Select:

Insert Telephone Number

Insert Full Address (Street, City, State, Zip Code) Type in the bar

Insert Facsimile Number

If this office location is also required to be registered with FINRA or a state securities authority as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR). Provide CRD Branch Number

How many employees perform investment advisory functions from this office location?

Are other business activities conducted at this location? (Check all that apply)

- | | |
|--|--|
| <input type="checkbox"/> (1) Broker-dealer (registered and unregistered) | <input type="checkbox"/> (5) Registered municipal advisor |
| <input type="checkbox"/> (2) Bank (including a separately identifiable department or division of a bank) | <input type="checkbox"/> (6) Accountant or accounting firm |
| <input type="checkbox"/> (3) Insurance broker or agent | <input type="checkbox"/> (7) Lawyer or law firm |
| <input type="checkbox"/> (4) Commodity pool operator or commodity trading advisor (whether registered or Exempt from registration) | <input type="checkbox"/> (8) Other |

OTHER OFFICE LOCATION #5:

Is the address below a private residence? Select:

Insert Telephone Number

Insert Full Address (Street, City, State, Zip Code) Type in the bar

Insert Facsimile Number

If this office location is also required to be registered with FINRA or a state securities authority as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR). Provide CRD Branch Number

How many employees perform investment advisory functions from this office location?

Are other business activities conducted at this location? (Check all that apply)

- | | |
|--|--|
| <input type="checkbox"/> (1) Broker-dealer (registered and unregistered) | <input type="checkbox"/> (5) Registered municipal advisor |
| <input type="checkbox"/> (2) Bank (including a separately identifiable department or division of a bank) | <input type="checkbox"/> (6) Accountant or accounting firm |
| <input type="checkbox"/> (3) Insurance broker or agent | <input type="checkbox"/> (7) Lawyer or law firm |
| <input type="checkbox"/> (4) Commodity pool operator or commodity trading advisor (whether registered or Exempt from registration) | <input type="checkbox"/> (8) Other |

#2 Client Counts:

Financial Planning Clients: Approximate number of advisory clients receiving financial planning services during your most recently completed fiscal year=

Non-U.S. Clients: Approximate percentage (%) of Clients that are non-U.S. persons = %

Non-Regulatory AUM Clients: Approximate number of clients for whom you do not have Regulatory AUM but provided investment advisory services* during the most recent year =

*Services include but are not necessarily limited to:

- (1) financial planning and/or financial consulting,
- (2) investment consulting or advisement services,
- (3) pension consulting (that is not management), and
- (4) referrals to third-party money manager platforms.

(These clients need to be included in the column labeled Exact Number of advisory clients of Table 4A but will not be included in the Amount of AUM column of Table 4A and will not be included in Table 3A)

#3 Regulatory AUM

If you provide continuous and regular supervisory or management services to securities portfolios, provide the amount of Regulatory AUM. **Determine your Regulatory AUM based on the current market value of the assets as determined within 90 days prior to the date you will file the Form ADV Annual Amendment.** Determine market value using the same method you used to report account values to clients or to calculate fees for investment advisory services. Provide the exact amount of Regulatory AUM. **Rounded to the nearest dollar. DO NOT GUESS OR ESTIMATE.**

You must also provide the exact amount of client accounts. Note this question asks you to count the number of accounts, which is different than the instructions at #2 above, which asked you to provide information about your firm's number of clients. Typically, firms will have more accounts than clients because one client could have multiple accounts under management. The following is asking for accounts, not clients. One client can have multiple accounts. For example, one client could have two standard brokerage accounts, an IRA, a Roth-IRA and a Trust account. That would be one client with five accounts. Be sure to list the total number of accounts under management.

Regulatory AUM and number of accounts must be broken into discretionary assets and non-discretionary assets. A copy of the SEC's instructions, as found on the Form ADV instructions, to calculate Regulatory AUM has been included with this questionnaire.

Table 3A

Date of Regulatory AUM Calculations =

	Discretionary	Non-Discretionary Accounts	Total
AUM Amount			\$ 0.00
Number of Accounts			0

Indicate the approximate **dollar** amount of your total Regulatory AUM attributed to clients who are non-U.S. persons=

#4 Provide the type and number of your client(s) for each category:

Indicate the number of **clients** and amount of Regulatory AUM attributable to each of the following types of client(s). This question is asking for number of clients whereas previous Regulatory AUM question is asking for number of accounts. One client may have multiple accounts, but you need only count each client once for the chart below.

Important Guidance:

- Include **ALL** firm clients such as: Non-Regulatory and Regulatory AUM clients, Financial Planning Clients and Third-Party Money Manager clients.
- **What if a client fits into more than one category?** Select the one category that most accurately represents the client to avoid double counting clients and assets.
- Count clients the way you normally count them for your firm. For example some investment advisors count (**whichever method you choose, be consistent from year-to-year**):
 - multiple members of the same family (and a family trust) as a single client **or**,
 - multiple members of the same family (and a family trust) as separate clients.

Table 4A

* Include exact numbers, DO NOT round or estimate.

Place your clients in the below categories:	Exact Number of advisory clients*	Amount of AUM*
A. Non-High Net Worth Individuals (includes trust, estates, and IRAs and 401(k) plans of individuals and their family members)		
B. High Net Worth Individuals (\$1,100,000 of invested assets with your firm or \$2,200,000 net worth not including primary residence)		
C. Banking or thrift institutions		
D. Investment Companies		
E. Business Development Companies		
F. Pooled Investment Vehicles		
G. Pension and Profit Sharing Plans		
H. Charitable Organizations		
I. State or Municipal Government Entities		
J. Other Investment Advisers		
K. Insurance Companies		
L. Sovereign Wealth Funds and Foreign Official Institutions		
M. Corporations of other businesses not listed above		
N. Other: Please provide description of the client		
Totals:	0	\$ 0.00

#5 Check and Confirm your answers:

The Amount of AUM totals from Table 3A and Table 4A **MUST BE THE SAME**.

	Table 3A	Table 4A	Does the Amount of AUM for Table 3A match the Amount of AUM in Table 4A?
Amount of AUM	\$ 0.00	\$ 0.00	<input type="radio"/> Yes <input type="radio"/> No

#6 Wrap Fee Program:

Do you participate in one or more wrap free programs? Select One:

What is the amount of your Regulatory AUM* attributable to acting as:

a.Sponsor to the wrap-fee programs?	
b.Portfolio Manager for a wrap-fee program?	
c.Sponsor to and Portfolio Manager for the same wrap-fee program?	

If you report an amount in "c", do not include that amount in "a" or "b".

*Do not include wrap-fee program accounts not included in your Regulatory AUM

Helpful Definitions	
Sponsor	A sponsor of a wrap fee program sponsors, organizes, or administers the program or selects, or provides advice to clients regarding the selection of, other investment advisers in the program.
Portfolio Manager	A portfolio manager of a wrap fee program controls the assets held within the Wrap Accounts and chooses appropriate investments and allocates the funds in the account.

#7 Separately Managed Accounts

#7a Regulatory AUM attributable to separately managed accounts:

Helpful Tips and Definitions to use to answer the above question:	
For most investment adviser firms, 95%+, the answer is "Yes".	
All client types in Figure 4A except for D. Investment Companies, "E. Business Development Companies", and "F. Pooled	
For purposes of Form ADV, the SEC considers accounts of advisory clients other than those that are pooled investment vehicles to be "separately managed accounts".	
Pooled Investment Vehicle:	Registered investment companies, business development companies and pooled investment vehicles that are not registered (including, but not limited to, private funds) for which you serve as the investment adviser to the pooled investment vehicle.

Do you have Regulatory AUM (answer to #3) attributable to separately managed accounts? Select One Answer

#7a Regulatory AUM attributable to separately managed accounts (cont.):

Provide the approximate percentage of separately managed account Regulatory AUM attributable to each of the following categories of assets.

Important Guidance:

- Individual (i.e. direct) stock holdings need to be reported at (i) and (ii).
- Individual (i.e. direct) bond holdings need to be reported at (iii) through (vii).
- ALL Mutual Funds (legally known as open-end companies), Closed-End Funds (legally known as closed-end companies), UITs (legally known as unit investment trusts), and Exchange Traded Funds (ETFs) are SEC registered investment companies so need to be included at (ix).

Asset Types	Approximate % (round up or round down to the nearest whole number)
(i) Exchange-Traded Equity Securities	
(ii) Non-Exchange-Traded Equity Securities	
(iii) U.S. Government/Agency Bonds	
(iv) U.S. State and Local Bonds	
(v) Sovereign Bonds	
(vi) Investment Grade Corporate Bonds	
(vii) Non-Investment Grade Corporate Bonds	
(viii) Derivatives	
(ix) Securities Issued by Registered Investment Companies or Business Development Companies (ex: Mutual Funds, UITs, ETFs)	
(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	
(xi) Cash and Cash Equivalents	
(xii) Other Add description of "Other" category	

The SEC provided the following Form ADV guidance to help you determine how assets listed in the preceding chart should be reported.

If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

End of year refers to the date used to calculate your regulatory assets under management for purposes of your annual updating amendment. These columns (%'s) can add up to a range from 94% to 106%.

Columns do not have to add up to 100%.

Investments in derivatives, registered investment companies, business development companies, and pooled investment vehicles should be reported in those categories. Do not report those investments based on related or underlying portfolio assets. Cash equivalents include bank deposits, certificates of deposit, bankers' acceptances and similar bank instruments.

Some assets could be classified into more than one category or require discretion about which category applies. You may use your own internal methodologies and the conventions of your service providers in determining how to categorize assets, so long as the methodologies or conventions are consistently applied and consistent with information you report internally and to current and prospective clients. However, you should not double count assets, and your responses must be consistent with any instructions or other guidance relating to this Section.

#7b Borrowing Transactions:

Do you engage in borrowing transactions (for example short selling and margin accounts) on behalf of any of the separately managed account clients that you advise?

- Yes, and I completed Table 7bc because our Regulatory AUM is more than \$500 million and less than \$10 billion
- Yes, and I will **NOT completed** Table 7bc because our Regulatory AUM is less than \$500 million. *I will skip to #7c*
- Yes, and I will request RCC for additional table to complete, because our Regulatory AUM is at least \$10 billion
- No, and I will skip to #7c

#7c Derivative Transactions

Do you engage in derivative transactions on behalf of any of the separately managed account clients that you advise?

- Yes, and I completed Table 7bc because our Regulatory AUM is more than \$500 million and less than \$10 billion
- Yes, and I will **NOT completed** Table 7bc because our Regulatory AUM is less than \$500 million. *I will skip to #7d*
- Yes, and I will request RCC for additional table to complete, because our Regulatory AUM is at least \$10 billion
- No, and I will skip to #7d

Complete Table 7bc below if you answered "yes" to "b" and "c" above.

In Table 7bc provide the following information regarding the separately managed accounts you advise as of the date used to calculate your Regulatory AUM. If you are a sub adviser to a separately managed account, you should only provide information with respect to the portion of the account that you sub advise.

Table 7bc

Gross National Exposure	(1) Regulatory AUM	(2) Borrowing
Less than 10%		
10-149%		
150% or more		

Helpful tips to complete the Table 7bc

Column 1 - Regulatory AUM	Indicate the Regulatory AUM attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any borrowings and (b) the gross notional value* of all derivatives, by (ii) the Regulatory AUM of the account.
Column 2 - Borrowings	Provide the dollar amount of borrowings** for the accounts included in column 1. You may, but are not required to, complete the table with respect to any separately managed accounts with Regulatory AUM of less than \$10,000,000.
*Gross national value	Defined in the Glossary to Form ADV as "The gross nominal or notional value of all transactions that have been entered into but not yet settled as of the reporting date. For contracts with variable nominal or notional principal amounts, the basis for reporting is the nominal or notional principal amounts as of the reporting date. For options, use delta adjusted notional value."
** Borrowings	Defined in the Glossary to Proposed Form ADV as "[S]ecured borrowings and unsecured borrowings, collectively. Secured borrowings are obligations for borrowed money in respect of which the borrower has posted collateral or other credit support and should include any reverse repos (i.e., any sale of securities coupled with an agreement to repurchase the same (or similar) securities at a later date at an agreed price). Unsecured borrowings are obligations for borrowed money in respect of which the borrower has not posted collateral or other credit support."

#7d Qualified Custodians

Complete a separate profile for each custodian that holds **ten percent or more** of your aggregate separately managed account Regulatory AUM. If no one qualified custodian holds ten percent or more of your separately managed account assets, you do not need to complete this section.

Custodian 1: Please provide, custodian's full legal name:	
a) The location of the custodian's office(s) responsible for custody of the assets: Please provide, street address, city, state and zip code:	
b) Is the custodian a related person of your firm?	<input type="radio"/> Yes <input type="radio"/> No
c) If the custodian is a broker-dealer, provide its SEC registration number (if any):	SEC Registration Number: 8-
d) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity identifier (if any):	Legal Entity Identifier
e) What dollar amount of your Regulatory AUM attributable to separately managed accounts is held at the custodian?	
Custodian 2: Please provide, custodian's full legal name:	
a) The location of the custodian's office(s) responsible for custody of the assets: Please provide, street address, city, state and zip code:	
b) Is the custodian a related person of your firm?	<input type="radio"/> Yes <input type="radio"/> No
c) If the custodian is a broker-dealer, provide its SEC registration number (if any):	SEC Registration Number: 8
d) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity identifier (if any):	Legal Entity Identifier
e) What dollar amount of your Regulatory AUM attributable to separately managed accounts is held at the custodian?	
Custodian 3: Please provide, the custodian's full legal name:	
a) The location of the custodian's office(s) responsible for custody of the assets: Please provide, street address, city, state and zip code:	
b) Is the custodian a related person of your firm?	<input type="radio"/> Yes <input type="radio"/> No
c) If the custodian is a broker-dealer, provide its SEC registration number (if any):	SEC Registration Number - 8
d) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity identifier (if any):	Legal Entity Identifier
e) What dollar amount of your Regulatory AUM attributable to separately managed accounts is held at the custodian?	
Custodian 4: Please provide, the custodian's full legal name:	
a) The location of the custodian's office(s) responsible for custody of the assets: Please provide, street address, city, state and zip code:	
b) Is the custodian a related person of your firm?	<input type="radio"/> Yes <input type="radio"/> No
c) If the custodian is a broker-dealer, provide its SEC registration number (if any):	SEC Registration Number - 8
d) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity identifier (if any):	Legal Entity Identifier
e) What dollar amount of your Regulatory AUM attributable to separately managed accounts is held at the custodian?	

#8 Custody Dollars and Clients:

If your firm reports having Custody on Form ADV Part 1A, Item 9, please provide the following information:

Firm:

Amount of Custody Dollars=

Number of Custody Clients=

Related Persons*:

Amount of Custody Dollars=

Number of Custody Clients=

The amounts listed for your related persons should **also be included in the amounts of your custody dollars and clients*

#9 State Registered Firms Only:

If your firm is state registered, provide the total dollar amount of securities investments and total dollar amount of non-securities investments* made in the last year based on financial planning services provided to the number of clients you listed at #2 of this questionnaire. If your answer to #2 is "0" (meaning you do not have any financial planning clients), do not provide a response below. Your answer can be a range.

(This includes all investments made, not just assets placed in an advisory account. For example, if you prepared a financial plan for a client and that same client then uses you to establish an asset management account, a regular commission-based brokerage account and a life insurance policy, you need to include the investments made in the 2 accounts and the premium received for the insurance policy.)

Securities Investments =

Non-Securities Investments =

*Non-securities investments include:
insurance products (other than variable annuities which are considered securities), real estate, coins, gold, silver, etc.

Name of Person Completing Questionnaire: