

Item 1 Cover Page

Richard J. Walters, CFP®, AIF®

Comprehensive Financial Planning, Inc.

Brochure Supplement

Dated 05/07/2025

**Contact: Richard Walters, CFP®, AIF®, Chief Compliance Officer
5995 Lemon Street
East Petersburg, Pennsylvania 17520**

This Brochure Supplement provides information about Richard J. Walters, CFP®, AIF®, that supplements the Comprehensive Financial Planning, Inc. Brochure. You should have received a copy of that Brochure. Please contact Richard J. Walters, CFP®, AIF®, Chief Compliance Officer, if you did *not* receive Comprehensive Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this supplement.

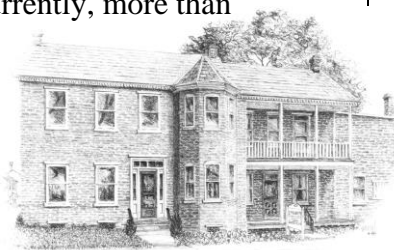
Additional information about Richard J. Walters, CFP®, AIF®, is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Richard J. Walters, CFP®, AIF®, was born in 1955. Mr. Walters graduated from the University of Richmond in 1977, with a Bachelor of Science degree in Business Administration. Mr. Walters is an Officer and an investment adviser representative of Comprehensive Financial Planning, Inc. since 1984. Mr. Walters has also held an insurance license since 1977. Since 1992, Mr. Walters has been a Marketing Representative for Comprehensive Benefit Marketing Services, Inc.

Mr. Walters has been a CERTIFIED FINANCIAL PLANNER™ since 1987. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 98,000 individuals have obtained CFP® certification in the United States.



To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances.
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Also, Mr. Walters has obtained in 2014 the Accredited Investment Fiduciary® (AIF®) designation. 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.

Item 3 Disciplinary Information

None in the last 10 years.

Item 4 Other Business Activities

Licensed Insurance Agent. Mr. Walters, 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. Walters to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Walters 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. Walters. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 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 requirements of supervision requirements of Section 203(e)(6) of the Investment Advisor's Act ("Act"). The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, 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 or investment adviser representative 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 Mr. Walters at (717) 569-6667.



Item 1 Cover Page

Brooke W. Herr

Comprehensive Financial Planning, Inc.

Brochure Supplement

Dated 05/07/2025

Contact: Richard Walters, CFP®, AIF®, Chief Compliance Officer
5995 Lemon Street
East Petersburg, Pennsylvania 17520

This Brochure Supplement provides information about Brooke W. Herr that supplements the Comprehensive Financial Planning, Inc. Brochure. You should have received a copy of that Brochure. Please contact Richard J. Walters, CFP®, AIF®, Chief Compliance Officer, if you did *not* receive Comprehensive Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Brooke W. Herr is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Brooke W. Herr was born in 1954. Mr. Herr attended the University of Alabama and Millersville University. Mr. Herr has been a Financial Planner of Comprehensive Financial Planning, Inc. since 1985. Mr. Herr has also held an insurance license since 1978. Since 1992, Mr. Herr has been a Marketing Representative for Comprehensive Benefit Marketing Services, Inc.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Licensed Insurance Agent. Mr. Herr, 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. Herr to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Herr 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. Herr. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 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 requirements of supervision requirements of Section 203(e)(6) of the Investment Advisor's Act ("Act"). The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, 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 or investment adviser representative 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 Mr. Walters at (717) 569-6667.



Item 1 Cover Page

Michael V. Kowalick

Comprehensive Financial Planning, Inc.

Brochure Supplement

Dated 05/07/2025

Contact: Richard Walters, CFP®, AIF®, Chief Compliance Officer
5995 Lemon Street
East Petersburg, Pennsylvania 17520

This Brochure Supplement provides information about Michael V. Kowalick that supplements the Comprehensive Financial Planning, Inc. Brochure. You should have received a copy of that Brochure. Please contact Richard J. Walters, CFP®, AIF®, Chief Compliance Officer, if you did *not* receive Comprehensive Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Michael V. Kowalick is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Michael V. Kowalick was born in 1955. Mr. Kowalick graduated from Bloomsburg State College in 1977, with a Bachelor of Science degree in Business Administration. Mr. Kowalick has been a Financial Planner of Comprehensive Financial Planning, Inc. since 2005. Mr. Kowalick has also held an insurance license since 1996. Since 1996, Mr. Kowalick has been a Marketing Representative for Comprehensive Benefit Marketing Services, Inc.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities



Licensed Insurance Agent. Mr. Kowalick, 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. Kowalick to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Kowalick 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. Kowalick. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 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 requirements of supervision requirements of Section 203(e)(6) of the Investment Advisor's Act ("Act"). The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, 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 or investment adviser representative 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 Mr. Walters at (717) 569-6667.



Item 1 Cover Page

Wendel L. King, AIF®

Comprehensive Financial Planning, Inc.

Brochure Supplement

Dated 05/07/2025

Contact: Richard Walters, CFP®, AIF®, Chief Compliance Officer
5995 Lemon Street
East Petersburg, Pennsylvania 17520

This Brochure Supplement provides information about Wendel L. King, AIF®, that supplements the Comprehensive Financial Planning, Inc. Brochure. You should have received a copy of that Brochure. Please contact Richard J. Walters, CFP®, AIF®, Chief Compliance Officer, if you did *not* receive Comprehensive Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Wendel L. King, AIF® is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Wendel L. King was born in 1970. Mr. King graduated from Eastern Mennonite University in 1992, with a Bachelor of Science degree in Business Administration. Mr. King has been a Financial Planner of Comprehensive Financial Planning, Inc. since 2007. Mr. King has also held an insurance license since 2006. Since 2006, Mr. King has been a Marketing Representative for Comprehensive Benefit Marketing Services, Inc. From 1996 through 2002, Mr. King was CFO of Moccasin Run Golf Club.

Mr. King has obtained in 2014 the Accredited Investment Fiduciary® (AIF®) designation. 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.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Licensed Insurance Agent. Mr. King, 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. King to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. King 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. King. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 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 requirements of supervision requirements of Section 203(e)(6) of the Investment Advisor's Act ("Act"). The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, 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 or investment adviser representative 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 Mr. Walters at (717) 569-6667.



Item 1 Cover Page

Patrick J. Cloonan, Jr., CFP®, CDFA®, CDS™

Comprehensive Financial Planning, Inc.

Brochure Supplement

Dated 05/07/2025

Contact: Richard Walters, Chief Compliance Officer
5995 Lemon Street
East Petersburg, Pennsylvania 17520

This Brochure Supplement provides information about Patrick J. Cloonan, Jr. that supplements the Comprehensive Financial Planning, Inc. Brochure. You should have received a copy of that Brochure. Please contact Richard J. Walters, CFP®, AIF®, Chief Compliance Officer, if you did *not* receive Comprehensive Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Patrick J. Cloonan, Jr. is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Patrick J. Cloonan, Jr. was born in 1968, and grew up in Lancaster County. Mr. Cloonan graduated from Manheim Township High School in 1987. He continued his education at Shippensburg University and graduated in 1991 with a Bachelor of Science degree in Public Administration. Mr. Cloonan then attended West Virginia University and graduated with a Master of Science degree in Labor and Industrial Relations. Mr. Cloonan has been a financial planning practitioner since 1996. Mr. Cloonan has also held an insurance license since 1994. He became a CFP® in 2003.

Mr. Cloonan has been a CERTIFIED FINANCIAL PLANNER™ since 2003. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial



planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 98,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances.
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Mr. Cloonan received his Certified Divorce Financial Analyst® (CDFA®) certification in March 2018. The Divorce Financial Advisor Practice Standards establish the level of professionalism that is expected of Certified Divorce Financial Analyst® (CDFA®) practitioners. These principles-based Standards have been developed to provide guidance to those involved in divorce financial analyst services.



The Certified Divorce Financial Analyst certification process conveys to the public that those individuals who have been authorized to use the CDFA designation have met stringent professional standards and have agreed to adhere to the Code of Ethics and Professional Responsibility.

- Experience – CDFA practitioners must have a minimum of 3 years work experience in a financial or legal capacity prior to earning the right to use the CDFA certification mark.
- Education – CDFA candidates must also develop their theoretical and practical understanding and knowledge of the financial aspects of divorce by completing a comprehensive course of study approved by the Institute for Divorce Financial Analysts™ (IDFA™).
- Divorce Financial Analyst Examination – CDFA candidates must complete a four-part Educational Curriculum and Certification Exam that tests their understanding and knowledge of the financial aspects of divorce. The candidate must also demonstrate the practical application of this knowledge in the divorce process by completing a comprehensive case study.
- Ethics – CDFA practitioners agree to abide by a strict code of professional conduct known as the IDFA Code of Ethics and Professional Responsibility, which sets forth their ethical responsibilities to the public, clients, employers, and other professionals. The IDFA may perform a background check during this process and each CDFA candidate must disclose any investigations or legal proceedings relating to his or her professional or business conduct.
- Ongoing CDFA Certification Requirements – CDFA practitioners are required to maintain technical competence and to fulfill ethical obligations. Every two years, they must complete a minimum of fifteen (15) hours of continuing education specifically related to the field of divorce.

Mr. Cloonan received his Certified Divorce Specialist (CDS™). Training is for professionals in the legal, financial, mental health, and real estate fields who provide services for divorcing clients. CDS™ graduates are equipped with valuable divorce-specific information and a customized communications skillset to work with and collaborate on low and high conflict divorce cases.

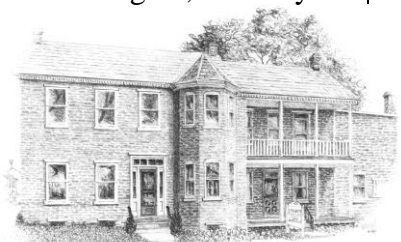
This CDS™ program is a highly involved and participatory 16-hour course. It consists of a specialized communication skills training with a focus on integrating those skills in a client-session environment. It also highlights specific legal, financial, mental health, and real estate information that are integral to the divorce process.

Item 3 Disciplinary Information

None in the last ten years.

Item 4 Other Business Activities

Licensed Insurance Agent. Mr. Cloonan, 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. Cloonan to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Cloonan 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. Cloonan. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 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 requirements of supervision requirements of Section 203(e)(6) of the Investment Advisor's Act ("Act"). The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, 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 or investment adviser representative 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 Mr. Walters at (717) 569-6667.



Item 1 Cover Page

Damon P. Heller, AIF®, CPFA®

Comprehensive Financial Planning, Inc.

Brochure Supplement

Dated 05/07/2025

**Contact: Richard Walters, CFP®, AIF®, Chief Compliance Officer
5995 Lemon Street
East Petersburg, Pennsylvania 17520**

This Brochure Supplement provides information about Damon P. Heller that supplements the Comprehensive Financial Planning, Inc. Brochure. You should have received a copy of that Brochure. Please contact Richard J. Walters, CFP®, AIF®, Chief Compliance Officer, if you did *not* receive Comprehensive Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this supplement.

**Additional information about Damon P. Heller is available on the SEC's website at
www.adviserinfo.sec.gov.**

Item 2 Education Background and Business Experience

Damon P. Heller was born in 1978. Mr. Heller graduated from Wilkes University in 2000, with a Bachelor of Science degree in Business Administration. Mr. Heller has been a Research Analyst of Comprehensive Financial Planning, Inc. since 2019. Also, Mr. Heller has been a Financial Planner of Comprehensive Financial Planning, Inc. since 2020. Mr. Heller has also held an insurance license since 2019.

Mr. Heller has obtained in September 2020 the Accredited Investment Fiduciary® (AIF®) designation. 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. Heller obtained in November 2024 the Certified Plan Fiduciary Advisor (CPFA®) designation awarded by the National Association of Plan Advisors (NAPA) to financial professionals who demonstrate expertise and experience in working with employer-sponsored retirement plans. Individuals holding the CPFA credential have completed specialized training and passed a comprehensive exam focused on fiduciary responsibilities, plan design, regulatory compliance, and best practices for advising retirement plan sponsors. CPFA designees are required to adhere to a fiduciary standard and complete annual continuing education, ten hours, to maintain their credential.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

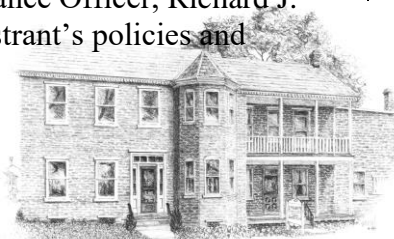
Licensed Insurance Agent. Mr. Heller, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Heller to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Heller 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. Heller. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant employee Mr. Heller provides investment research 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 requirements of supervision requirements of Section 203(e)(6) of the Investment Advisor's Act ("Act"). The Registrant's Chief Compliance Officer, Richard J. Walters, CFP®, AIF®, 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 or investment adviser representative 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 Mr. Walters at (717) 569-6667.

