

Item 1 – Cover Page

I AM, Inc.
4716 Bartlett Road
Williamsburg, MI 49690
231-922-0170

Date of Brochure: January 2021

This brochure provides information about the qualifications and investment advisory business practices of I AM, Inc. (I AM) If you have any questions about the contents of this brochure please contact us at **(231) 922-0170 and/or randyk@4iam.com**. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about our investment advisory business is also available on the Internet at www.adviserinfo.sec.gov. You can view our information on this website by searching for "I AM, Inc." You can also search using the firm's CRD numbers. The CRD number for the firm is **149501**.

*Registration as an investment advisor does not imply a certain level of skill or training.

Item 2 – Material Changes

Since our last annual brochure amendment was filed in February 2020, we have made no material changes to our brochure.

We will ensure that you receive a summary of material changes, if any, to this and subsequent disclosure brochures within 120 days after our fiscal year ends. Our fiscal year ends on December 31 so you will receive the summary of material changes, if any, no later than April 30 each year. At that time we will also offer a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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Item 4 – Advisory Business

I AM, Inc. (I AM) is an investment advisor registered with the State of Michigan. It is a corporation formed under the laws of the State of Michigan.

- I AM, Inc. (I AM) has been registered with the state of Michigan as an investment advisor since October 27, 2009.
- Randall A. Kamps is the company president, sole shareholder and sole employee

General Description of Primary Advisory Services

Financial Planning & Consulting Services - I AM offers holistic retirement income planning services focused on your overall financial situation and helps you establish retirement income objectives. We do not offer specific recommendations of individual securities but rather, turn key asset management programs. Our consulting services do not involve implementing any transaction on your behalf or the active and ongoing management of your investments or accounts. Currently, the best choice in our opinion is the Edelman Managed Asset Program (EMAP). While EMAP is our sole offering at this time, we are always reviewing other programs in order to best serve you.

Being holistic in nature, we offer our advice and guidance on all aspects related to retirement including but not limited to; Social Security, Health Insurance, Life Insurance, Annuities, Reverse Mortgages, Long Term Care, Housing, Trusts, Estates and Investments.

You have the sole responsibility for determining whether to implement our advice and consulting recommendations, however we are here to assist you in navigating through all the various forms and processes required.

Retirement Plan Consulting:

I AM offers advisory services to retirement plan sponsors of all types with the following functions:

1. Platform research and development – upon the client executing an advisory agreement, I AM will research qualified retirement plan custodians that will hold retirement plan participant assets and provide an investment trading platform for participants as well as annually review the performance of same in achieving the client's objectives.
2. I AM will provide advice, consultation and review of the Plan Document at Plan inception. I AM will provide ongoing review and guidance pertaining to the performance of the Plan Document in achieving the client's objectives as well as monitoring/initiating any required administrative/reporting activities (i.e. government reporting/compliance) associated with same.
3. I AM will also research and recommend the various investment arrangements that the plan sponsor can make available to the plan participants. I AM will review the Annual Report(s) to Trustees and provide a synopsis of same to the client annually.
4. Provide enrollment and educational training to plan participants as requested.

Outside Money Managers:

I AM provides advisory services by referring clients to Financial Engines Advisors LLC an outside, or unaffiliated, money manager that is registered as an investment advisor. While relying upon the Third-party money managers for daily monitoring of client accounts and making trades in client accounts when necessary, I AM maintains responsibility for continuously overseeing and review of client accounts to insure continued suitability.

Specialization

The firm specializes in providing individualized investment advice through thoroughly evaluating each client's financial needs and expectations and referring the client to a suitable Third-Party Money Manager.

Limits Advice to Certain Types of Investments

We provide investment advice on the following types of investments.

- wrap asset allocation programs
- mutual fund shares of no-load, open-end registered investment companies,
- exchange-traded funds (ETFs), and
- occasionally, variable annuities.

We don't sponsor, nor are we affiliated with, these investments.

We do not provide advice on securities traded over-the-counter, foreign issues, warrants, corporate debt securities (other than commercial paper), commercial paper, certificates of deposit, municipal securities, variable life insurance, United States government securities, options contracts on securities or commodities, futures contracts on tangibles or intangibles, or interests in partnerships investing in real estate, oil and gas interests.

(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)

Tailor Advisory Services to Individual Needs of Clients

Our services are always provided based on the individual needs of each client. This means, for example, that the client is given the ability to impose restrictions on the services we provide for them, including specific investment selections and sectors. We work with each client on a one-on-one basis through interviews and questionnaires to determine the Plan's needs.

Client Assets Managed by I AM, Inc.

I AM does not manage client accounts.

Item 5 – Fees and Compensation

In addition to the information provided in Item 4 – Advisory Business, this section provides details regarding our fees and compensation arrangements.

Financial Planning and Consulting Services

I AM does not charge separately for our Financial Planning and Consulting Services.

Employer Sponsored Retirement Plan Consulting:

I AM will not maintain custody of plan assets. At times the retirement plan providers may need assistance in selecting a custodial platform through which participants in the plan may make investments. In circumstances in which a retirement plan provider needs assistance locating a qualified custodian for the plan assets and the research of investment options to provide within the plan, in its capacity as a registered investment advisor, I AM, Inc. (I AM) may provide retirement plan consulting services and assist the plan in selecting the investment selections that will be offered within the plan. When acting in this capacity, we will typically recommend the American Funds platform or the Edelman Retirement Program Investment Management Agreement offered by Financial Engines Advisors LLC and, based on the needs of the plan, we will recommend the investment options to be offered through the plan from the investment options available on the American Funds platform or the Edelman Retirement Program Investment Management Agreement. Additionally, we may assist the plan with plan participant training in relation to the plan and the investments offered in the plan. Training will be general educational training. We will not make any individual recommendations to the plan participants. We don't sponsor, nor are we affiliated with American Funds platform or Financial Engines Advisors LLC.

Either party may terminate services at any time by providing written notice to the other party. If this disclosure document has not been provided to the client 48 hours prior to the client executing an agreement for services, the client will have 5 business days to terminate the agreement without penalty. After the initial five day period, fees will be billed prorated based on the number of days that services were provided prior to notice of termination.

We will charge an annual percentage of the total value of assets invested in the Plan. The maximum annual fee will be .75% and will be determined based on the size of the plan, then number of participants, and the complexity of the services that will be provided. Fees will be billed quarterly in arrears based on the period ending value of plan assets. Fees for partial periods will be billed on a prorated basis based on the number of days that services were provided during the billing period. Fees will be automatically deducted from the plan assets by the plan custodian or third-party administrator who will then pay the fees directly to us. Such authority to deduct the fees will be granted to the custodian or the third-party administrator and not us. We will not be responsible for calculating the fee or for providing the custodian or third-party administrator with notification to pay such fees. While we will determine the amount of the fee and the timing of when the fee will be paid, the manner in which the fee will be paid will be pursuant to an arrangement between the plan provider and the plan custodian or third-party administrator.

Individual and Individual Retirement Plan Consulting:

I AM conducts due diligence on behalf of individual and individual retirement plan clients to identify unaffiliated third-party investment advisors offering asset management and other investment advisory

services. Through said unaffiliated third-party investment advisors, I AM offers well-diversified asset allocation models for clients.

Currently, the best choice, in our opinion, is the Edelman Managed Asset Program (EMAP).

The investments in EMAP models include:

- Mutual Fund shares of no-load, open-end registered investment companies,
- Exchange-traded funds (“ETFs”)

I AM is not affiliated with these investments or with any third-party investment advisors other than what is disclosed to the client.

I AM (“Advisor”) meets with clients to discuss their needs. The main factors that help us recommend an asset allocation model to clients are their investment objectives and risk tolerance. We also consider the client’s personal situation; including age, health, family circumstances, income expenses, assets, debts, liquidity needs, goals, personal objectives, suitability, time horizon and other relevant factors.

The Annual Fee Schedule associated with **EMAP** accounts are based on the following schedule:

Total Assets	Total Client Fee	I AM Fee Portion
\$0 - \$150,000	1.75%	1.05%
\$150,000 - \$250,000	1.75%	1.05%
\$250,000 - \$400,000	1.75%	1.05%
\$400,000 - \$500,000	1.25%	0.75%
\$500,000 - \$750,000	1.25%	0.75%
\$750,000 - \$1 million	1.00%	0.50%
\$1 million - \$1.25 million	0.75%	0.40%
\$1.25 million - \$3 million	0.75%	0.35%
\$3 million - \$10 million	0.60%	0.25%
\$10 million - \$25 million	0.50%	0.20%
\$25 million +	Negotiable	Negotiable

Clients may incur additional charges including but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, IRA and qualified retirement plan fees. I AM will not receive any portion of such commissions or fees. We are only compensated by the fee schedule described above and/or as disclosed prior to contract signing. We receive no other compensation in connection with a client’s account.

As full compensation for its services I AM is paid quarterly a fee equal to one-fourth of the annual rates specified in the table above, based on the average daily asset value of the Account during each calendar quarter on which the New York Stock Exchange is open for trading (the “Valuation Date”). The initial billing period will begin when the Tri-Party Agreement is signed by Client and accepted by EMAP, and initial funding has been received by the Custodian (the “Inception Date”). The initial fee will be pro-rated to cover the period from the Inception Date through the Valuation Date for that calendar quarter and will be based on the average daily asset value as of that Valuation Date. Future quarterly fees will be calculated similarly in arrears. If EMAP/I AM shall serve for less than the whole of any quarter compensation shall be determined as provided above on the basis of the average daily asset value of the assets in the Account as of the end of the date of termination and shall be payable on a pro rata basis for

the period of the quarter for which it served. Client shall direct the Custodian automatically to charge to the Account and pay directly to EMAP or its delegate all asset-based fees upon the Custodian's receipt of an invoice from EMAP or its delegate. EMAP will pay I AM its share after settlement quarterly.

Fees are not negotiable.

Third-Party Money Managers

A complete description of Financial Engines Advisors LLC's services, fee schedules and account minimums will be disclosed in their disclosure brochure which will be provided to you prior to or at the time an agreement for services is executed and the account is established. If Financial Engines Advisors LLC offers the option to negotiate advisory fees will also be discussed in their disclosure brochure.

The asset management fees charged by Financial Engines Advisors LLC will range up to 1.75% and may be negotiable based upon the type of client, the services requested, the complexity of the client's situation, the composition of the client's account, other advisory services provided and the relationship of the client and the investment adviser representative. The exact fees and other terms will be outlined in the agreement between you and Financial Engines Advisors LLC

All fees are calculated and collected by Financial Engines Advisors LLC who will be responsible for delivering our portion of the fee paid by you to us.

Under this program, you may incur additional charges including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges and IRA and qualified retirement plan fees. I AM, Inc. will not receive any portion of any additional charges clients may incur.

We have a conflict of interest by only offering those third-party money managers that have agreed to pay a portion of their advisory fee to us and have met the conditions of our due diligence review. There may be other third-party money managers that may be suitable for you that may be more or less costly. No guarantees can be made that your financial goals or objectives will be achieved. Further, no guarantees of performance can be offered.

I AM, Inc. and our associated persons do not receive any compensation for the sale of securities or other investment products.

Item 6 – Performance-Based Fees and Side-By-Side Management

Item 6 of the Form ADV Part 2 instructions is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees which can be defined as fees based on a share of capital gains on or capital appreciation of the assets held within a client's account.

Item 7 – Types of Clients

We generally provide investment advice to the following types of clients:

- Individuals

- Pension and profit sharing plans
- Corporations or business entities other than those listed above

Minimum Investment Amounts Required

I AM has set a minimum account size of \$5,000 to engage and contract for its services with a client.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

I AM, Inc. uses the following methods of analysis in formulating investment advice.

Fundamental - A method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

I AM, Inc. uses the following investment strategies when managing client assets and/or providing investment advice.

Long term purchases. Investments held at least a year.

Use of Primary Method of Analysis or Strategy

Our primary method of analysis or strategy is Fundamental. Some of the risks involved with using this method are listed below.

The primary strategy utilized within EMAP is strategic rebalancing of open ended and no-load mutual funds and ETF funds. EMAP utilizes a proprietary scoring system to select the funds from the entire universe of available mutual funds and ETFs that are utilized in their various "risk models". EMAP's proprietary scoring system considers cost amongst other "weighting factors" as well as diversification within the funds as it determines how well the fund/ETF tracks a given index in seeking the best representation of a given asset class. Every month the EMAP investment committee reviews the scores and utilizes the funds that perform most efficiently. EMAP does not sponsor any fund or ETF. Each model incorporates a different mix (equity/income %) which is then compared to the client's Guide To Portfolio Selection score to determine the most suitable managed portfolio for them.

Primarily Recommend One Type of Security

We primarily do not recommend only one type of Security.

Risk of Loss

Clients must understand that past performance is not indicative of future results. Therefore, current and prospective clients (including you) should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated when investing in securities through our investment management program.

- **Market Risk** – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Equity (stock) market risk** – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- **Company Risk**. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- **Fixed Income Risk**. When investing in bonds, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- **Options Risk**. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- **ETF and Mutual Fund Risk** – When we invest in an ETF or mutual fund for a client, the client will bear additional expenses based on its pro rata share of the ETFs or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects

the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.

- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Item 9 – Disciplinary Information

This item is not applicable to our brochure because there are no legal or disciplinary events listed at Item 9 of the Form ADV Part 2 instructions that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

I AM, Inc. is **not** and does **not** have a related company that is a:

1. broker/dealer, municipal securities dealer, government securities dealer or broker,
2. futures commission merchant, commodity pool operator or commodity trading adviser,
3. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund),
4. other investment adviser,
5. financial planning firm,
6. banking or thrift institution,
7. accounting firm,
8. lawyer or law firm,
9. real estate broker or dealer, or
10. sponsor or syndicator of limited partnerships.

Insurance Activities

I AM, Inc. is licensed as an insurance agency and the Company President is licensed as an independent insurance agent through various insurance companies. You are never obligated or required to use purchase insurance products through the firm in our separate insurance capacities; however, the company and our president do not actively solicit the sale of insurance products, but we may receive payments from insurance companies on products previously sold. I AM Inc. and our Company President have the ability to help you obtain insurance products and will receive separate compensation (i.e. insurance commissions) in addition to investment advisory fees charged.

I AM, Inc. spends approximately 1% of our time offering insurance products.

Third-Party Money Manager

I AM, Inc. has developed a referral program with/to Financial Engines Advisors LLC a division of Cantor Fitzgerald Investment Advisors, L.P., previously described in *Item 4* and *Item 5* of this disclosure brochure. Once you execute an agreement with the third-party money manager to manage all or a portion of your assets, the third-party money manager will pay us a portion of the fees you are charged.

Please refer to *Items 4 and 5* for full details regarding the programs, fees, conflicts of interest and materials arrangements when I AM, Inc. refers clients to Financial Engines Advisors LLC. I AM, Inc. will not refer clients to Third-Party Money managers that are not appropriately registered or exempt from registration in the residence state of the client.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

I AM, Inc. has established a Code of Ethics that will apply to all of its associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle for the advisor's Code of Ethics which also covers its Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and when changes occur, all supervised persons will sign an acknowledgement that they have read, understand and agree to comply with the advisor's Code of Ethics. We have the responsibility to make sure that the interests of all clients are placed ahead of ours or our supervised person's own investment interest. Full disclosure of all material facts and conflicts of interest will be provided to clients prior to any services being conducted. We and our supervised persons must conduct business in an honest, ethical and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all you a summary of our Code of Ethics. However, if a client or a potential client wishes to review advisor's Code of Ethics in its entirety, a copy will be provided promptly upon request.

Affiliate and Employee Personal Securities Transactions Disclosure

Participation or Interest in Client Transactions

I AM, Inc. and its associated persons may buy or sell securities that are also recommended to clients. In accordance with our fiduciary duty to clients, we and our associated persons will place client interests ahead of our own interests.

Item 12 – Brokerage Practices

I AM Inc. does not enter in to relationships with clients that would involve the trading of a client's account on a discretionary or non-discretionary basis.

Trade Errors

I AM Inc. does not enter in to relationships with clients that would involve the trading of a client's account on a discretionary or non-discretionary basis therefore trade errors should never be an issue for the firm.

However should a trade error occur at an account managed by an Outside Money manager we will work with the client to make sure the issue is satisfactorily resolved.

Consistent with our fiduciary duty, it is our policy to make certain trade errors are corrected in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client will be responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. If the error is caused by the broker-dealer, the broker-dealer will be responsible for covering all trade error costs.

We will never benefit or profit from trade errors.

Aggregation of Client Orders-Block Trading Policy

I AM Inc. does not enter in to relationships with clients that would involve the trading of a client's account on a discretionary or non-discretionary basis therefore Trade Aggregation for clients should never be an issue for the firm.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Randall A. Kamps, President and Investment Advisor Representative will conduct an annual review of the investments offered in the plan for retirement plan consulting clients and will make recommendations regarding any changes to the funds offered.

Statements and Reports

Clients will receive confirmations and statements from their account custodian. We will not provide reports to clients contracting for investment advisory services.

Item 14 – Client Referrals and Other Compensation

We do not directly or indirectly compensate anybody for client referrals.

The only form of other compensation received from advisory services is the fees charged for providing investment advisory services as described in Item 5 of this brochure. We receive no other forms of compensation in connection with providing investment advice.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented. According to this definition, we do not have custody of client funds or securities.

Item 16 – Investment Discretion

I AM, Inc. does not provide any investment advisory services that would require the use of any discretionary or non-discretionary trading authority.

Through its retirement plan consulting services, I AM, Inc. will only provide recommendations concerning the suitability of a retirement plan custodial platform for the needs of the client (Plan Sponsor) and make recommendations concerning the investment choices to make available to the plan participants.

Once the above factors are agreed upon, the plan participants will be responsible for making decisions regarding the timing of buying or selling an investment.

All clients (Plan Sponsor) have the ability to place reasonable restrictions on the types of investments that may be allowed within in the plan.

Item 17 – Voting Client Securities

I AM, Inc. will not vote proxies on behalf of your account. While there are some investment advisors that will vote proxies and other corporate decisions on behalf of their clients, we have determined that taking on the responsibility for voting client securities does not add enough value to the services provided to clients to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in accounts managed by our firm.

Clients will receive proxies directly from their custodian or transfer agent and such documents will not be delivered by our firm. Although we do not vote client proxies, if you have a question about a particular proxy feel free to contact us.

Item 18 – Financial Information

This item is not applicable to this brochure. We do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, we have not been the subject of a bankruptcy petition at any time.

Item 19 – Requirements for State-Registered Advisers

Education and Business Standards

I AM, Inc. will require that anyone involved in providing investment advice or determining the investment advice to be given have a college degree and a minimum of 5 years business experience in the financial industry. Additionally, they must obtain any industry required licenses or designations.

Education and Business Background

Randall A. Kamps Born: 1955

Education Background:

Calvin College, Grand Rapids, MI, 1977-BA- Business/Economics with a concentration in accounting and finance

Business Background:

I AM, Inc., President and Sole Shareholder, Dec. 2001 to Present
Retirement LLC, Limited Partner (Member), July 2013 to 12/2018

Other Business Activities

As disclosed in Item 10 – Other Financial Industry Activities and Affiliations, we engage in other activities besides giving investment advice.

No Performance Based Fees

As previously disclosed in Item 6, we do not charge performance-based fees.

No Arbitrations

We have not been the subject of any client arbitrations, similar legal disputes or been a party to any bankruptcy actions.

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Privacy Policy Notice

I AM, Inc. takes protecting your privacy very seriously. We are committed to maintaining all of your nonpublic information, both personal and financial, in a confidential manner. This notice explains the types of nonpublic information we collect about you, and the limited situations in which we disclose it to any third parties.

In our normal course of business, it is necessary for us to collect certain nonpublic information about you, in order to provide you with the services or products you request. We collect this information from the following sources:

- Information collected directly from you, either in person or forms or applications.
- Information collected from documents you provide to us.
- Information about your transactions with us, our affiliates, or others.

The types of nonpublic information we may collect about you include, but are not limited to:

- Name, social security number and address.
- Assets and income.
- Account numbers and balances.
- Parties to transactions.

This firm does not disclose any nonpublic information about you to any third party without your consent, except as permitted or required by law. Third parties that perform services for you on our behalf, such as investment management, will receive your nonpublic information only as necessary to perform their functions, and are not allowed to share this information or use it for any other purpose. Internally, we restrict access to your nonpublic information to those employees who need the information in order to provide you with the services or products you have requested. This firm maintains physical, electronic and procedural safeguards to guard your nonpublic information.

Information Required by Part 2B of Form ADV: *Brochure Supplement*

The following are responses to each item found in the Form ADV Part 2B instructions.

Item 1 – Cover Page

All information required in the Form ADV Part 2B instructions can be found on the cover page of this Disclosure Brochure.

Item 2 – Educational Background and Business Experience

Please see Item 19 of this Disclosure Brochure for my education and business experience background.

Item 3 – Disciplinary Information

As previously stated in Item 9 of this Disclosure Brochure, I have never been subject to a legal or disciplinary event.

Item 4 – Other Business Activities

Please see Item 10 and Item 19 of this Disclosure Brochure for details regarding my other business activities.

Item 5 – Additional Compensation

Other than the fees detailed in Item 5 of this Disclosure Brochure, I receive no other compensation related to advisory services provided to clients.

Item 6 – Supervision

I am the sole affiliate of my investment advisor firm and ultimately responsible for all activities and services provided by my firm.

Item 7 – Requirements for State-Registered Advisers – Legal and Financial Disclosure

I have not been the subject of any client arbitrations, similar legal disputes or the subject of any bankruptcy proceedings.