

Introduction

Partners in Financial Planning, LLC (“PIFP”), is an investment adviser registered with the Securities and Exchange Commission. Fees for brokerage and investment advisory services differ and it is important for you to understand the difference. Free and simple tools are available to research firms and financial professionals at www.Investor.gov, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

PIFP offers investment advisory services to retail investors. Our advisory services include Financial Planning, Investment Management, and Tax Preparation. If you open an account with us, we’ll meet with you to understand your current financial situation, risk tolerance and goals. Based on this analysis, we will recommend a portfolio of investments that is regularly monitored (at least monthly), and rebalanced as needed to keep your portfolio in line with our agreed upon target allocation. We will also review your portfolio when there is a change to your financial position or investment objectives, to determine if changes are warranted.

Our accounts are managed on a discretionary basis. This means that we don’t need to contact you before we buy or sell securities, as we will do periodically to keep your portfolio in line with our agreed upon allocation. You will sign an investment management agreement giving us this authority, and this arrangement will remain in place until you or we terminate our services. *You can find additional information about our advisory services in Item 4 of our [Firm Brochure](#).*

Questions to Ask Your Financial Professional:

- **Given my financial situation, should I choose an investment advisory service? Why or why not?**
- **How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**

What fees will I pay?

We charge fixed annual retainer fees, payable in quarterly installments. Your retainer fee will cover both financial planning and investment management services. Tax preparation services can also be added if desired.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. The more assets we manage for you, the more you will pay us. Therefore, we have an incentive to increase the value of your accounts over time.

The broker-dealer (custodian) that holds your assets may charge you a transaction fee when we buy or sell an investment for you. The broker-dealer’s transaction fees are in addition to our advisory fees. Some

investments, such as mutual funds and exchange traded funds, charge additional fees that will reduce the value of your investments over time.

Additional information about our fees is located in Item 5 of our [Firm Brochure](#).

Questions to Ask Your Financial Professional:

- **Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?**

What are your legal obligations to me when acting as my investment adviser?
How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours (we act as your fiduciary). At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. To help you understand what this means, an example would be you asking our advice about paying off a mortgage by selling some of the assets you have invested with us. If we advised you to sell assets, the future fees you pay us may be reduced, creating a potential conflict of interest. Additional information about our conflicts of interest can be found in Item 11 of our [Firm Brochure](#).

Our firm's revenue is derived solely from the advisory fees that we collect from our clients. We do not receive commissions associated with any investment or insurance products.

Questions to Ask Your Financial Professional:

- **How might your conflicts of interest affect me, and how will you address them?**

How do your financial professionals make money?

Our financial professionals are paid salaries, and they have the opportunity to earn bonuses based on their contributions and the success of the firm. Neither our firm nor our employees receive commissions tied to investment products, and our firm does not compensate employees for making client referrals.

Do you or your financial professionals have legal or disciplinary history?

No, neither our firm nor our financial professionals have any legal or disciplinary history. Visit www.investor.gov for a free and simple search tool to research our firm and our financial professionals.

Questions to Ask Your Financial Professional:

- **As a financial professional, do you have any disciplinary history? For what type of conduct?**

Additional Information

You can find additional information about our investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching CRD #151980. If you would like additional, up-to-date information or an updated copy of this relationship summary, please call our office at (540) 444-2930.

Questions to Ask Your Financial Professional:

- **Who is my primary contact person?**
- **Is he or she a representative of an investment adviser or a broker-dealer?**
- **Who can I talk to if I have concerns about how this person is treating me?**

Item 1 Cover Page

Partners in Financial Planning, LLC

SEC File Number: 801 – 70754

Partners in Financial Planning, LLC

Brochure
Dated 2/16/2025

Contact: Stephen C. Bain, Chief Compliance Officer
421 South College Avenue
Salem, Virginia 24153
www.partnersinfinancialplanning.com

This brochure provides information about the qualifications and business practices of Partners In Financial Planning, LLC (“PIFP”). If you have any questions about the contents of this brochure, please contact us at (540) 444-2930 or stephen@partnersinfinancialplanning.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Partners in Financial Planning, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Material Changes to Form ADV Part 2A Brochure

February 16, 2025 – no material changes

February 14, 2024 – no material changes

February 9, 2023 – no material changes

January 5, 2022 - we opened a new office, in Charleston, SC.

March 23, 2021 – no material changes

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Item 4 Advisory Business

- A. Partners in Financial Planning, LLC is a limited liability company formed on September 29, 2009 in the state of Delaware. The firm became registered as an Investment Adviser Firm in November 2009. PIFP is owned by James E. Pearman, Jr., Pamela D. Poldiak, Richard K. Bryan, Christopher W. Bishop and Stephen C. Bain. James Pearman is our Managing Member, Stephen Bain is our Chief Compliance Officer, Richard Bryan is our Chief Investment Officer, and Christopher Bishop is our Chief Operating Officer.

- B. As discussed below, we offer our clients (individuals, business entities, trusts, estates, charitable organizations and pension and profit sharing plans, etc.) investment advisory services, personal financial planning services and related consulting services.

INVESTMENT ADVISORY SERVICES

We provide discretionary investment advisory services on a fixed-fee annual retainer basis. See Item 5 (Fees and Compensation) for additional details on how fees are calculated.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

We may provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone hourly fee basis to a limited number of clients. Prior to engaging Partners in Financial Planning to provide planning or consulting services, clients are generally required to enter into a *Financial Planning and Consulting Agreement* with us setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to our firm commencing services.

MISCELLANEOUS

Non-Investment Consulting/Implementation Services. As part of our investment advisory and financial planning engagements, we may provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Neither Partners in Financial Planning, LLC, nor any of its representatives, serves as an attorney or licensed insurance agent, and no portion of our services should be construed as same. To the extent requested by a client, we may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance agents, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation made by our firm. If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. It remains the client's responsibility to promptly notify us if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

Trade Error Policy. PIFP shall reimburse accounts for losses resulting from our firm's trade errors, but shall not credit accounts for such errors resulting in market gains. The gains and losses are reconciled within our custodian firms' accounts and PIFP retains the net gains and losses.

Client Obligations. In performing its services, PIFP shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify us if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

Disclosure Statement. A copy of our written Brochure as set forth on Part 2A of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the *Investment Advisory Agreement or Financial Planning and Consulting Agreement*. Any client who has not received a copy of our written Brochure at least 48 hours prior to executing the *Investment Advisory Agreement or Financial Planning and Consulting Agreement* shall have five business days subsequent to executing the agreement to terminate our services without penalty.

- C. Partners in Financial Planning, LLC shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, we shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on our services.
- D. We do not participate in a wrap fee program.
- E. As of December 31, 2024, Partners in Financial Planning, LLC had \$779,819,330 in total assets under management. All of these assets are being managed on a discretionary basis.

Item 5 Fees and Compensation

- A. Partners in Financial Planning, LLC offers investment advisory services, financial planning services and related consulting services.

INVESTMENT ADVISORY SERVICES

The annual retainer fee for wealth management or asset management services is charged on a quarterly basis and is based on a fixed planning fee component in addition to a percentage of the assets under management. The total fee typically ranges from 0.25% to 1.00% per year depending on the size and complexity of the client's accounts, whether tax preparation is involved, whether there are specifically negotiated fees, and whether they are on a historically grandfathered fee schedule. The specific fee schedule charged is established in a client's written agreement.

For new clients we require prepayment of the first three months of fees, to ensure compensation for our initial financial planning work.

Tax preparation services included in the base annual fee assume simple individual Federal and state income tax returns. Complex individual returns and corporate, trust and estate returns will incur additional fees.

Our annual investment advisory fees shall generally cover both investment advisory services and ongoing financial planning services. In the event that the client requires extraordinary planning and/or consultation services, Partners in Financial Planning may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

We may provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone hourly fee basis to a limited number of existing clients. We are no longer offering hourly services to new clients. Our hourly fee for financial planning and/or consulting services is negotiable, but shall generally be \$350. Prior to engaging us to provide planning or consulting services, clients are generally required to enter into a *Financial Planning and Consulting Agreement* setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to PIFP commencing services.

- B. Clients may elect to have their advisory fees deducted from their custodial accounts. Both our *Investment Advisory Agreement* and the custodial/ clearing agreement may authorize the custodian to debit the account for the amount of our investment advisory fee and to directly remit that management fee to us in compliance with regulatory procedures. In the event that we bill the client directly, payment is due upon receipt of our invoice.
- C. Unless the client directs otherwise or an individual client's circumstances require, we shall generally recommend that TD Ameritrade, Inc. ("*Ameritrade*"), Charles Schwab ("*Schwab*") and/or Fidelity Investments ("*Fidelity*") serve as the broker-dealers/custodians for client investment management assets. Broker-dealers such as *Ameritrade*, *Schwab* and *Fidelity* charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). In addition to Partners in Financial Planning's investment management fee, brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). When beneficial to the client, individual fixed-income and/or equity transactions may be effected through broker-dealers with whom our firm and/or the client have entered into arrangements for prime brokerage clearing services, including effecting certain client transactions through other SEC registered and FINRA member broker-dealers (in which event, the client generally will incur both the transaction fee charged by the executing broker-dealer and a "tradeaway" fee charged by *Ameritrade* or *Fidelity*).
- D. Partners in Financial Planning, LLC shall deduct fees and/or bill clients quarterly or semi-annually in advance, based upon the fixed annual fee calculated as described above. A new annual fee will be calculated on the one year anniversary of the client's original contract date, and then a revised fee will be calculated again every two years thereafter. If significant assets are added to the client's investment accounts between fee calculation dates – from inheritances, business sales, retirement account rollovers or other cash inflows – we reserve the right to calculate a new annual fee to be in effect upon the addition of the new assets.

- E. The *Investment Advisory Agreement* between Partners in Financial Planning, LLC and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Investment Advisory Agreement*. Upon termination, Partners in Financial Planning, LLC shall refund the pro-rated portion of the advanced advisory fee paid based upon the number of days remaining in the billing period.
- F. Neither Partners in Financial Planning, LLC, nor its representatives accept compensation from the sale of securities or other investment products.

Item 6 Performance-Based Fees and Side-by-Side Management

Neither Partners in Financial Planning, LLC nor any supervised person of the firm accepts performance-based fees.

Item 7 Types of Clients

Partners in Financial Planning, LLC's clients shall generally include individuals, business entities, trusts, estates, charitable organizations and pension and profit sharing plans.

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

- A. Partners in Financial Planning, LLC may utilize the following methods of security analysis:
 - Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
 - Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
 - Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

Partners in Financial Planning, LLC may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)

Please Note: Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Partners in Financial Planning, LLC) will be profitable or equal any specific performance level(s).

- B. Partners in Financial Planning, LLC's methods of analysis and investment strategies do not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis we must have access to current/new market information. PIFP has no control over the dissemination rate of market information; therefore, unbeknownst to us,

certain analyses may be compiled with outdated market information, severely limiting the value of our analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Partners in Financial Planning, LLC's primary investment strategies - Long Term Purchases and Short Term Purchases - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy.

- C. Currently, Partners in Financial Planning, LLC primarily allocates client investment assets among various individual equity and fixed income securities, mutual funds and/or exchange traded funds, on a discretionary and non-discretionary basis in accordance with the client's designated investment objective(s).

Item 9 Disciplinary Information

Partners in Financial Planning, LLC does not have any reportable disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

- A. Neither PIFP, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither PIFP, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. PIFP does not have any relationship or arrangement that is material to its advisory business or to its clients with any related person.
- D. PIFP does not recommend or select other investment advisors for its clients.

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

- A. Partners in Financial Planning, LLC maintains an investment policy relative to personal securities transactions. This investment policy is part of our overall Code of Ethics, which serves to establish a standard of business conduct for all of our representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, PIFP also maintains and enforces written policies reasonably designed to prevent the misuse of

material non-public information by our firm or any person associated with us.

- B. Neither Partners in Financial Planning, LLC nor any related person of our firm recommends, buys, or sells for client accounts, securities in which we or any related person has a material financial interest.
- C. Partners in Financial Planning, LLC and/or representatives of our firm *may* buy or sell securities that are also recommended to clients. This practice may create a situation where PIFP and/or representatives of the firm are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as “scalping” (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if we did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, “front-running” (i.e., personal trades executed prior to those of our clients) and other potentially abusive practices.

Partners in Financial Planning, LLC has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of our “Access Persons”. Our securities transaction policy requires that all of our Access Persons must provide the Chief Compliance Officer or his/her designee with a written report of the their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person’s current securities holdings at least once each twelve (12) month period thereafter on a date we select; provided, however that at any time that Partners in Financial Planning, LLC has only one Access Person, he or she shall not be required to submit any securities report described above.

- D. Partners in Financial Planning, LLC and/or our representatives *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where PIFP and/or representatives of the firm are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11 C, we have a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of our Access Persons.

Item 12 Brokerage Practices

- A. In the event that the client requests that Partners in Financial Planning, LLC recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct us to use a specific broker-dealer/custodian), we generally recommend that investment management accounts be maintained at *Ameritrade* and/or *Fidelity*. Prior to engaging our firm to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with us setting forth the terms and conditions under which we shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that Partners in Financial Planning, LLC considers in recommending *Ameritrade* and/or *Fidelity* (or any other broker-dealer/custodian to clients) include historical relationship with our firm, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by our clients shall comply with our duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where we determine, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, our investment management fee. Partners in Financial Planning, LLC's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

1. Research and Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, we may receive from *Ameritrade*, *Schwab* and/or *Fidelity* (or another broker-dealer/custodian) without cost (and/or at a discount) support services and/or products, certain of which assist us to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by us may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by our firm in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that may be received may assist us in managing and administering client accounts. Others do not directly provide such assistance, but rather assist our firm to manage and further develop its business enterprise.

PIFP's clients do not pay more for investment transactions effected and/or assets maintained at *Ameritrade*, *Schwab* and/or *Fidelity* as a result of this arrangement. There is no corresponding commitment made by us to *Ameritrade*, *Schwab* and/or *Fidelity* or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

2. Partners in Financial Planning, LLC does not receive referrals from broker-dealers.
3. PIFP does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and we will not seek better execution

services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by our firm. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

Please Note: In the event that the client directs us to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through our firm.

- B. To the extent that Partners in Financial Planning, LLC provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or "bunch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. PIFP shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13 Review of Accounts

- A. For those clients to whom we provide investment supervisory services, account reviews are conducted on an ongoing basis. All investment supervisory clients are advised that it remains their responsibility to advise us of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with us on an annual basis.
- B. Partners in Financial Planning, LLC *may* conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client requests.
- C. Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. Those clients to whom we provide investment advisory services may also receive a periodic report from us summarizing account activity and performance.

Item 14 Client Referrals and Other Compensation

- A. As referenced in Item 12.A.1 above, Partners in Financial Planning, LLC may receive an indirect economic benefit from *Ameritrade*, *Schwab* and/or *Fidelity*. We, without cost

(and/or at a discount), may receive support services and/or products from *Ameritrade, Schwab* and/or *Fidelity*.

Our clients do not pay more for investment transactions effected and/or assets maintained at *Ameritrade, Schwab* and/or *Fidelity* as a result of this arrangement. There is no corresponding commitment made by our firm to *Ameritrade, Schwab* and/or *Fidelity* or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

- B. Partners in Financial Planning, LLC does not compensate, directly or indirectly, any person for client referrals.

Item 15 Custody

Partners in Financial Planning, LLC shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. Those clients to whom we provide investment advisory services may also receive a periodic report from us summarizing account activity and performance.

Please Note: To the extent that Partners in Financial Planning, LLC provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by us with the account statements received from the account custodian.

Please Also Note: The account custodian does not verify the accuracy of PIFP's advisory fee calculation.

Item 16 Investment Discretion

The client can determine to engage PIFP to provide investment advisory services on a discretionary basis. Prior to us assuming discretionary authority over a client's account, the client shall be required to execute an *Investment Advisory Agreement*, naming PIFP as client's attorney and agent in fact, granting us full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage our firm on a discretionary basis may, at any time, impose restrictions, **in writing**, on our discretionary authority. (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe our use of margin, etc).

Item 17 Voting Client Securities

- A. Partners in Financial Planning, LLC does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all

elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact us to discuss any questions they may have with a particular solicitation.

Item 18 Financial Information

- A. Partners in Financial Planning, LLC does not solicit fees of more than \$1,200, per client, six months or more in advance.
- B. Partners in Financial Planning, LLC is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. Partners in Financial Planning, LLC has never been the subject of a bankruptcy petition.

ANY QUESTIONS: Partners in Financial Planning, LLC's Chief Compliance Officer, Stephen C. Bain, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.

Item 1 Cover Page

A.

James E. Pearman, Jr.

Partners in Financial Planning, LLC

Brochure Supplement
Dated 2/16/2025

Contact: Stephen C. Bain, Chief Compliance Officer
421 South College Avenue
Salem, Virginia 24153
www.partnersinfinancialplanning.com

B.

This brochure supplement provides information about James E. Pearman, Jr. that supplements the Partners in Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Stephen C. Bain, Chief Compliance Officer if you did *not* receive Partners in Financial Planning, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about James E. Pearman, Jr. is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

James E. Pearman, Jr. was born in 1948. Mr. Pearman graduated from Virginia Polytechnic Institute and State University in 1970, with a Bachelor of Science in Business degree and a major in Accounting (with Honors). Mr. Pearman has served as Principal of Partners in Financial Planning, LLC since November of 2009. From January of 1993 to November of 2009 Mr. Pearman was a Principal of Fee-Only Financial Planning, LLC.

Mr. Pearman became a Certified Financial Planner (CFP®) in March of 1992. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are

required to hold a bachelors degree from an accredited university. Current CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Prior to the institution of the comprehensive CFP® Certification Examination in 1991, CFP® candidates took a series of six individual subject exams instead of the single exam. This rule applied to Mr. Pearman, who passed exams on the principles of financial planning, insurance planning and risk management, investment planning, income tax planning, retirement planning, and estate planning. CFP® designees also have ongoing ethics requirements and oversight by the CFP® Board.

Mr. Pearman has been designated as a Personal Financial Specialist (“PFS”) since 1996. The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the American Institute of CPAs (“AICPA”). Mr. Pearman did not have to pass the comprehensive financial planning exam since he was a CFP® licensee. A PFS credential holder is required to adhere to AICPA’s *Code of Professional Conduct*, and is encouraged to follow AICPA’s *Statement on Responsibilities in Financial Planning Practice*. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

Mr. Pearman has held the designation of Certified Public Accountant (“CPA”) since 1972. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA’s *Code of Professional Conduct* within their state accountancy laws or have created their own.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. Mr. Pearman is not actively engaged in any other investment-related business or occupation.
- B. Mr. Pearman is not actively engaged in any non-investment-related business or occupation for compensation.

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, Stephen C. Bain, 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. Bain who can be reached at (540) 444-2930.

Item 1 Cover Page

A.

Pamela D. Poldiak

Partners in Financial Planning, LLC

Brochure Supplement

Dated 2/16/2025

Contact: Stephen C. Bain, Chief Compliance Officer
421 South College Avenue
Salem, Virginia 24153
www.partnersinfinancialplanning.com

B.

This brochure supplement provides information about Pamela D. Poldiak that supplements the Partners in Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Stephen C. Bain, Chief Compliance Officer if you did *not* receive Partners in Financial Planning, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Pamela D. Poldiak is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Pamela D. Poldiak was born in 1969. Ms. Poldiak graduated from The McIntire School of Commerce at the University of Virginia in 1991, with a degree in Accounting. Ms. Poldiak has served as Principal and Chief Compliance Officer of Partners in Financial Planning, LLC since November of 2009. From February of 2000 to November of 2009 Ms. Poldiak was employed as a financial advisor of Fee-Only Financial Planning, LLC.

Pamela D. Poldiak became a Certified Financial Planner (CFP®) in 1998. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelors degree from an accredited university. CFP® candidates must pass an examination that

covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Pamela D. Poldiak has held the designation of Certified Public Accountant (“CPA”) since 1993. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA’s *Code of Professional Conduct* within their state accountancy laws or have created their own.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. Ms. Poldiak is not actively engaged in any other investment-related business or occupation.
- B. Ms. Poldiak is not actively engaged in any non-investment-related business or occupation for compensation.

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, Stephen C. Bain, 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. Bain who can be reached at (540) 444-2930.

Item 1 Cover Page

A.

Todd D. Dalton

Partners in Financial Planning, LLC

Brochure Supplement

Dated 2/16/2025

Contact: Stephen C. Bain, Chief Compliance Officer
421 South College Avenue
Salem, Virginia 24153
www.partnersinfinancialplanning.com

B.

This brochure supplement provides information about Todd D. Dalton that supplements the Partners in Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Stephen C. Bain, Chief Compliance Officer if you did *not* receive Partners in Financial Planning, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Todd D. Dalton is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Todd D. Dalton was born in 1967. Mr. Dalton graduated from the Eberly College of Arts and Sciences at West Virginia University in 1990 with a degree in Political Science. Mr. Dalton has served as a financial planner with Partners in Financial Planning, LLC since September, 2011. From 2001 to September of 2011 Mr. Dalton was a staff accountant at Robert Cadd, Inc. P.C.

Todd D. Dalton became an Enrolled Agent (EA) in 2009. The EA designation identifies individuals who have successfully passed the Special Enrollment Examination (SEE) administered by the Internal Revenue Service. The Special Enrollment Examination broadly covers taxation in relation to individuals and businesses, as well as representation, practices and procedures. In order to maintain an Enrolled Agent license, Mr. Dalton must complete a minimum of 72 hours in continuing professional education (CPE), which includes 6 hours of

ethics, every three years. Enrolled Agents must abide by all applicable provisions in the Treasury Department's Circular 230 "Regulations Governing Practice Before the Internal Revenue Service".

Todd D. Dalton has held a license as an investment advisor representative (Series 65), since 2010. The Series 65 exam is administered by the Financial Industry Regulatory Authority and Mr. Dalton is registered with the State of Virginia.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. Mr. Dalton is not actively engaged in any other investment-related business or occupation.
- B. Mr. Dalton is not actively engaged in any non-investment-related business or occupation for compensation.

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, Stephen C. Bain, 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. Bain who can be reached at (540) 444-2930.

Item 1 Cover Page

C.

Richard K. Bryan

Partners in Financial Planning, LLC

Brochure Supplement

Dated 2/16/2025

Contact: Stephen C. Bain, Chief Compliance Officer

421 South College Avenue

Salem, Virginia 24153

www.partnersinfinancialplanning.com

D.

This brochure supplement provides information about Richard K. Bryan that supplements the Partners in Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Stephen C. Bain, Chief Compliance Officer if you did *not* receive Partners in Financial Planning, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Richard K. Bryan is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Richard K. Bryan was born in 1969. Mr. Bryan graduated from Liberty University, with a degree in Finance. Mr. Bryan has served as a financial planner with Partners in Financial Planning, LLC since October of 2012. From April of 2011 to October of 2012 Mr. Bryan served as Principal and Chief Compliance Officer of Bryan Wealth Management, LLC. From October of 2002 to April of 2011 Mr. Bryan served as a financial planner with Vanguard.

Richard K. Bryan became a Certified Financial Planner (CFP®) in 2006. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelors degree from an accredited university. CFP® candidates must pass an examination that

covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- C. Mr. Bryan is not actively engaged in any other investment-related business or occupation.
- D. Mr. Bryan is not actively engaged in any non-investment-related business or occupation for compensation.

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, Stephen C. Bain, 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. Bain who can be reached at (540) 444-2930.

Item 1 Cover Page

A.

Christopher W. Bishop

Partners in Financial Planning, LLC

Brochure Supplement

Dated 2/16/2025

Contact: Stephen C. Bain, Chief Compliance Officer
421 South College Avenue
Salem, Virginia 24153
www.partnersinfinancialplanning.com

B.

This brochure supplement provides information about Christopher W. Bishop that supplements the Partners in Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Stephen C. Bain, Chief Compliance Officer if you did *not* receive Partners in Financial Planning, LLC's brochure or if you have any questions about the contents of this supplement.

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

Item 2 Education Background and Business Experience

Christopher W. Bishop was born in 1978. Mr. Bishop graduated from the Pamplin College of Business at Virginia Tech University in 2001 with a degree in Business Information Technology. Mr. Bishop has served as a financial planner with Partners in Financial Planning, LLC since July, 2014. From 2001 to April of 2014, Mr. Bishop was in the Information Technology Field and was employed by companies such as Sprint and Carilion Clinic.

Christopher W. Bishop became a Certified Financial Planner (CFP®) in July 2016. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass

an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. Mr. Bishop is not actively engaged in any other investment-related business or occupation.
- B. Mr. Bishop is not actively engaged in any non-investment-related business or occupation for compensation.

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, Stephen C. Bain, 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. Bain who can be reached at (540) 444-2930.

Item 1 Cover Page

A.

Stephen C. Bain

Partners in Financial Planning, LLC

Brochure Supplement

Dated 2/16/2025

Contact: Stephen C. Bain, Chief Compliance Officer
421 South College Avenue
Salem, Virginia 24153
www.partnersinfinancialplanning.com

B.

This brochure supplement provides information about Stephen C. Bain that supplements the Partners in Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Stephen C. Bain, Chief Compliance Officer if you did *not* receive Partners in Financial Planning, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Stephen C. Bain is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Stephen C. Bain was born in 1989. Mr. Bain graduated from the Pamplin College of Business at Virginia Tech University in 2011, with a degree in Finance. Mr. Bain has served as a financial planner with Partners in Financial Planning, LLC since January 2016. From July 2011 to December of 2015, Mr. Bain was a financial planner with Stearns Financial Group in Greensboro, NC.

Stephen C. Bain became a Certified Financial Planner (CFP®) in June 2014. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelors degree from an accredited university. CFP® candidates must pass an

examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. Mr. Bain is not actively engaged in any other investment-related business or occupation.
- B. Mr. Bain is not actively engaged in any non-investment-related business or occupation for compensation.

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, Stephen C. Bain, 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. Bain who can be reached at (540) 444-2930.

Item 1 Cover Page

A.

Sethalan Carter

Partners in Financial Planning, LLC

Brochure Supplement

Dated 2/16/2025

Contact: Stephen C. Bain, Chief Compliance Officer
421 South College Avenue
Salem, Virginia 24153
www.partnersinfinancialplanning.com

B.

This brochure supplement provides information about Sethalan Carter that supplements the Partners in Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Stephen C. Bain, Chief Compliance Officer if you did *not* receive Partners in Financial Planning, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Sethalan Carter is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Sethalan Carter was born in 1999. Mr. Carter graduated from the Pamplin College of Business at Virginia Tech University in 2020, with a degree in Finance. Mr. Carter has served as a financial planner with Partners in Financial Planning, LLC since January 2021.

Sethalan Carter became a Certified Financial Planner (CFP®) in December 2022. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least two years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits

planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. Mr. Carter is not actively engaged in any other investment-related business or occupation.
- B. Mr. Carter is not actively engaged in any non-investment-related business or occupation for compensation.

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, Stephen C. Bain, 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. Bain who can be reached at (540) 444-2930.