

Item 1 Cover Page

A.

Philip F. Rongo, Jr.

IBEX Wealth Advisors, LLC

Brochure Supplement

Dated: June 17, 2019

**Contact: James J. Varaklis, Chief Compliance Officer
3 Werner Way
Lebanon, New Jersey 08833**

B.

This Brochure Supplement provides information about Philip F. Rongo, Jr. that supplements the IBEX Wealth Advisors, LLC Brochure; you should have received a copy of that Brochure. Please contact James J. Varaklis, Chief Compliance Officer, if you did *not* receive IBEX Wealth Advisors, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Philip F. Rongo, Jr. is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Philip F. Rongo, Jr. was born in 1962. Mr. Rongo graduated from the State University of New York at Buffalo in 1984, with a Bachelor of Arts degree in Geography and International Trade. Mr. Rongo has been a Member and an investment adviser representative of IBEX Wealth Advisors, LLC since September of 2013. Since March 2006, Mr. Rongo has been a Managing Partner with Round Valley Wealth Management. Mr. Rongo has also been a registered representative of LPL Financial Corporation since November of 1997.

Mr. Rongo has held the designation of Chartered Financial Consultant (ChFC®) since 1998. ChFC® is a financial planning designation for the insurance industry conferred by The American College. Candidates must meet education, experience, examination, and continuing ethical requirements. Candidates must have at least three years of experience in the financial industry, or an undergraduate or graduate degree from an accredited university and two years of experience in the financial industry. Candidates are required to take nine academic courses each followed by

an exam. The courses and exams cover topics in finance, investing, insurance, and estate planning.

Mr. Rongo has held the designation of Chartered Life Underwriter (CLU®) since 2000. CLU® is a financial planning designation for the insurance industry conferred by The American College. Candidates must meet education, experience, examination, and continuing ethical requirements. Candidates must have at least three years of experience in the financial industry, or an undergraduate or graduate degree from an accredited university and two years of experience in the financial industry. Candidates are required to take eight academic courses each followed by an exam. The courses and exams cover topics in finance, investing, insurance, and estate planning.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of LPL Financial Corporation.** Mr. Rongo is a registered representative of LPL Financial Corporation (“LPL”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Rongo in his individual capacity as a registered representative of LPL, to implement investment recommendations on a commission basis.
1. **Conflict of Interest.** The recommendation by Mr. Rongo that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Rongo. Clients are reminded that they may purchase investment products recommended by Mr. Rongo through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, James J. Varaklis, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions.** In the event the client chooses to purchase investment products through LPL, brokerage commissions will be charged by LPL to effect securities transactions, a portion of which commissions shall be paid by LPL to Mr. Rongo. The securities commission business conducted by Mr. Rongo is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.

- B. **Licensed Insurance Agent.** Mr. Rongo, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Rongo to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Rongo that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Rongo. Clients are reminded that they may purchase insurance products recommended by Mr. Rongo through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, James J. Varaklis, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, James J. Varaklis, 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, independent contractor, investment adviser representative, or solicitor 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. Varaklis at (908) 849-7921.

Item 1 Cover Page

A.

Glenn E. Stephenson

IBEX Wealth Advisors, LLC

Brochure Supplement

Dated: June 17, 2019

Contact: James J. Varaklis, Chief Compliance Officer

3 Werner Way

Lebanon, New Jersey 08833

B.

This Brochure Supplement provides information about Glenn E. Stephenson that supplements the IBEX Wealth Advisors, LLC Brochure; you should have received a copy of that Brochure. Please contact James J. Varaklis, Chief Compliance Officer, if you did *not* receive IBEX Wealth Advisors, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Glenn E. Stephenson is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Glenn E. Stephenson was born in 1963. Mr. Stephenson graduated from Fairleigh Dickenson University in 1985, with a magna cum laude Bachelor of Science degree in Business Administration. Mr. Stephenson has been a Member and an investment adviser representative of IBEX Wealth Advisors, LLC since September of 2013. Mr. Stephenson has also been a registered representative of LPL Financial Corporation since December of 1999.

Mr. Stephenson has been a CERTIFIED FINANCIAL PLANNER™ since 1989. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number

of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 83,000 individuals have obtained CFP® certification in the United States.

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

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

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

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

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

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of LPL Financial Corporation.** Mr. Stephenson is a registered representative of LPL Financial Corporation (“LPL”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Stephenson in his individual capacity as a registered representative of LPL, to implement investment recommendations on a commission basis.
1. **Conflict of Interest.** The recommendation by Mr. Stephenson that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Stephenson. Clients are reminded that they may purchase investment products recommended by Mr. Stephenson through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, James J. Varaklis, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions.** In the event the client chooses to purchase investment products through LPL, brokerage commissions will be charged by LPL to effect securities transactions, a portion of which commissions shall be paid by LPL to Mr. Stephenson. The securities commission business conducted by Mr. Stephenson is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.
- B. **Licensed Insurance Agent.** Mr. Stephenson, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Stephenson to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Stephenson that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any insurance commission products from Mr. Stephenson. Clients are reminded that they may purchase insurance products recommended by Mr. Stephenson through other, non-affiliated insurance agents. **The Registrant’s Chief Compliance Officer, James J. Varaklis, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, James J. Varaklis, 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, independent contractor, investment adviser representative, or solicitor 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. Varaklis at (908) 849-7921.

Item 1 Cover Page

A.

James J. Varaklis

IBEX Wealth Advisors, LLC

Brochure Supplement

Dated: June 17, 2019

Contact: James J. Varaklis, Chief Compliance Officer

3 Werner Way

Lebanon, New Jersey 08833

B.

This Brochure Supplement provides information about James J. Varaklis that supplements the IBEX Wealth Advisors, LLC Brochure; you should have received a copy of that Brochure. Please contact James J. Varaklis, Chief Compliance Officer, if you did *not* receive IBEX Wealth Advisors, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about James J. Varaklis is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

James J. Varaklis was born in 1967. Mr. Varaklis graduated from the Fairleigh Dickinson University in 1989, with a Bachelor of Science degree in Biology. Mr. Varaklis has been a Member and an investment adviser representative of IBEX Wealth Advisors, LLC since September of 2013. Mr. Varaklis has also been a registered representative of LPL Financial Corporation since October 2004.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of LPL Financial Corporation.** Mr. Varaklis is a registered representative of LPL Financial Corporation (“LPL”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Varaklis in his individual capacity as a registered representative of LPL, to implement investment recommendations on a commission basis.
1. **Conflict of Interest.** The recommendation by Mr. Varaklis that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Varaklis. Clients are reminded that they may purchase investment products recommended by Mr. Varaklis through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, James J. Varaklis, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions.** In the event the client chooses to purchase investment products through LPL, brokerage commissions will be charged by LPL to effect securities transactions, a portion of which commissions shall be paid by LPL to Mr. Varaklis. The securities commission business conducted by Mr. Varaklis is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.
- B. **Licensed Insurance Agent.** Mr. Varaklis, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Varaklis to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Varaklis that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any insurance commission products from Mr. Varaklis. Clients are reminded that they may purchase insurance products recommended by Mr. Varaklis through other, non-affiliated insurance agents. **The Registrant’s Chief Compliance Officer, James J. Varaklis, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, James J. Varaklis, 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, independent contractor, investment adviser representative, or solicitor 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. Varaklis at (908) 849-7921.

Item 1 Cover Page

A.

Melinda B. Gaertner

IBEX Wealth Advisors, LLC

Brochure Supplement

Dated: June 17, 2019

Contacts: James J. Varaklis, Chief Compliance Officer
3 Werner Way
Lebanon, New Jersey 08833

B.

This Brochure Supplement provides information about Melinda B. Gaertner that supplements the IBEX Wealth Advisor's, LLC's Brochure; you should have received a copy of that Brochure. Please contact James J. Varaklis, Chief Compliance Officer, if you did *not* receive IBEX Wealth Advisors, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Melinda B. Gaertner is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Melinda B. Gaertner was born in 1978. Ms. Gaertner attended County College of Morris and has been employed as a Registered Client Relationship Manager with Ibex Wealth Advisors since October 2018. From January 2012 through October 2018, Ms. Gaertner was the Director of Marketing and Client Coordinator of Precision Financial Services.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of LPL Financial Corporation.** Ms. Gaertner is a registered representative of LPL Financial Corporation (“LPL”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Ms. Gaertner in her individual capacity as a registered representative of LPL, to implement investment recommendations on a commission basis.
1. **Conflict of Interest.** The recommendation by Ms. Gaertner that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Ms. Gaertner. Clients are reminded that they may purchase investment products recommended by Ms. Gaertner through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, James J. Varaklis, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions.** In the event the client chooses to purchase investment products through LPL, brokerage commissions will be charged by LPL to effect securities transactions, a portion of which commissions shall be paid by LPL to Ms. Gaertner. The securities commission business conducted by Ms. Gaertner is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.
- B. The supervised person 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 supervision requirements of Section 203(e)(6) of the Investment Adviser’s Act (“Act”). The Registrant’s Chief Compliance Officer, James J. Varaklis, 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, independent contractor, investment adviser representative, or solicitor 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. Varaklis at (908) 849-7921.

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A.

Jed Glick

IBEX Wealth Advisors, LLC

Brochure Supplement

Dated: June 17, 2019

Contacts: James J. Varaklis, Chief Compliance Officer
3 Werner Way
Lebanon, New Jersey 08833

B.

This Brochure Supplement provides information about Jed Glick that supplements the IBEX Wealth Advisor's, LLC's Brochure; you should have received a copy of that Brochure. Please contact James J. Varaklis, Chief Compliance Officer, if you did *not* receive IBEX Wealth Advisors, LLC's Brochure or if you have any questions about the contents of this supplement.

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

Item 2 Education Background and Business Experience

Jed Glick was born in 1978. Mr. Glick graduated from the University of Richmond in 2000, with a BSBA degree in Finance and Marketing. Mr. Glick has been a Senior Vice President of IBEX Wealth Advisors, LLC since October 2018. From December 2017 through June 2018, Mr. Glick was the Chief Financial Officer of Ni2O Inc. From May 2016 through October 2018, Mr. Glick was a Managing Director with Boatwright Capital LLC. From September 2011 through April 2016, Mr. Glick was a Managing Director with Savoy Capital, Inc.

Mr. Glick has been a CFA® Charterholder since 2004. CFA® designates an international professional certificate that is offered by the CFA Institute.

The Chartered Financial Analyst® (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 154,000 CFA® Charterholders working in over 165 countries and regions. To earn the CFA® charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA® Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 Additional Compensation

Mr. Glick's annual compensation is based, in part, on the number of clients and assets under management that Mr. Glick introduces to the Registrant. Accordingly, Mr. Glick has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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 supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, James J. Varaklis, 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, independent contractor, investment adviser representative, or solicitor 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. Varaklis at (908) 849-7921.

Item 1 Cover Page

A.

Denise Paige Anderson

IBEX Wealth Advisors, LLC

Brochure Supplement

Dated: June 17, 2019

**Contacts: James J. Varaklis, Chief Compliance Officer
3 Werner Way
Lebanon, New Jersey 08833**

B.

This Brochure Supplement provides information about Denise Paige Anderson that supplements the IBEX Wealth Advisor's, LLC's Brochure; you should have received a copy of that Brochure. Please contact James J. Varaklis, Chief Compliance Officer, if you did *not* receive IBEX Wealth Advisors, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Denise Paige Anderson is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Denise Paige Anderson was born in 1962. Ms. Anderson graduated from Reed College in 1984, with a Bachelor of Arts degree in Economics and from Columbia University School of Business in 1991 with an MBA. Ms. Anderson has been a Wealth Manager of IBEX Wealth Advisors, LLC since May 2019. Ms. Anderson has also been a registered representative of LPL Financial, LLC since May 2019. From March 2018 through January 2019, Ms. Anderson was a Financial Products Expert with BPP Wealth Solutions. From July 2017 through March 2018, Ms. Anderson was a Financial Representative with National Financial Network. From September 2014 through March 2017, Ms. Anderson was the CEO and Board Member with BeautyWorksWest Ltd.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of LPL Financial Corporation.** Ms. Anderson is a registered representative of LPL Financial Corporation (“LPL”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Ms. Anderson in her individual capacity as a registered representative of LPL, to implement investment recommendations on a commission basis.
1. **Conflict of Interest.** The recommendation by Ms. Anderson that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Ms. Anderson. Clients are reminded that they may purchase investment products recommended by Ms. Anderson through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, James J. Varaklis, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions.** In the event the client chooses to purchase investment products through LPL, brokerage commissions will be charged by LPL to effect securities transactions, a portion of which commissions shall be paid by LPL to Ms. Anderson. The securities commission business conducted by Ms. Anderson is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.
- B. **Licensed Insurance Agent.** Ms. Anderson, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Ms. Anderson to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Ms. Anderson that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any insurance commission products from Ms. Anderson. Clients are reminded that they may purchase insurance products recommended by Ms. Anderson through other, non-affiliated insurance agents. **The Registrant’s Chief Compliance Officer, James J. Varaklis, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

Ms. Anderson's annual compensation is based, in part, on the number of clients and assets under management that Ms. Anderson introduces to the Registrant. Accordingly, Ms. Anderson has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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 supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, James J. Varaklis, 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, independent contractor, investment adviser representative, or solicitor 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. Varaklis at (908) 849-7921.