

## Item 1 Cover Page

A.

### **Dean Joseph Catino**

Monument Capital Management, LLC

ADV Part 2B: Brochure Supplement

Dated: March 20, 2024

Contact: David Armstrong, Chief Compliance Officer  
1940 Duke Street, Suite 6100  
Alexandra, Virginia 22314

B.

**This Brochure Supplement provides information about Dean Joseph Catino that supplements the Monument Capital Management, LLC Brochure; you should have received a copy of that Brochure. Please contact David Armstrong, Chief Compliance Officer, if you did *not* receive Monument Capital Management, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Dean Joseph Catino is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

## Item 2 Education Background and Business Experience

Dean Joseph Catino was born in 1959. Mr. Catino graduated from Seton Hall University in 1981, with a Bachelor of Science degree in accounting. Mr. Catino has been an investment adviser representative of Monument Capital Management, LLC since August of 2012. Mr. Catino was a registered representative of LPL Financial Corporation from May of 2008 until December of 2018. From September of 2001 to May of 2008, Mr. Catino was a financial advisor of Merrill Lynch, Pierce Fenner & Smith.

Mr. Catino is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

### 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 other investment-related businesses or occupations.

#### **Item 5 Additional Compensation**

Mr. Cantino's annual compensation is based, in part, on the amount of assets under management that he introduces to the Registrant. Accordingly, he 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 Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, David Armstrong, 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 promoter 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. Armstrong at 703-504-9600.

## Item 1 Cover Page

A.

### **David Bruce Armstrong**

Monument Capital Management, LLC

Brochure Supplement

Dated: March 20, 2024

Contact: David Armstrong, Chief Compliance Officer  
1940 Duke Street, Suite 6100  
Alexandra, Virginia 22314

B.

**This Brochure Supplement provides information about David Bruce Armstrong that supplements the Monument Capital Management, LLC Brochure; you should have received a copy of that Brochure. Please contact David Armstrong, Chief Compliance Officer, if you did *not* receive Monument Capital Management, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about David Bruce Armstrong is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

## **Item 2 Education Background and Business Experience**

David Bruce Armstrong was born in 1967. Mr. Armstrong graduated from University of South Carolina in 1990, with a Bachelor of Arts degree in government and international relations and in 1999 with a Master of Business Administration degree. Mr. Armstrong has been an investment adviser representative of Monument Capital Management, LLC since February of 2013. Mr. Armstrong was a registered representative of LPL Financial Corporation from May of 2008 until December of 2018. From May of 2002 to May of 2008, Mr. Armstrong was a portfolio manager and Vice President of Merrill Lynch, Pierce, Fenner & Smith Incorporated. From August of 1999 to May of 2002, Mr. Armstrong was an Investment Associate and Private Banker of Donaldson, Lufkin & Jenrette and later Credit Suisse First Boston.

Mr. Armstrong has been a CFA® Charterholder since 2003. 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 190,000 CFA® Charterholders working in over 170 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 other investment-related businesses or occupations.

### **Item 5 Additional Compensation**

Mr. Armstrong's annual compensation is based, in part, on the amount of assets under management that he introduces to the Registrant. Accordingly, he 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**

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## Item 1 Cover Page

A.

### **Jessica Lydia Gibbs**

Monument Capital Management, LLC

ADV Part 2B: Brochure Supplement

Dated: March 20, 2024

Contact: David Armstrong, Chief Compliance Officer  
1940 Duke Street, Suite 6100  
Alexandra, Virginia 22314

B.

**This Brochure Supplement provides information about Jessica Lydia Gibbs that supplements the Monument Capital Management, LLC Brochure; you should have received a copy of that Brochure. Please contact David Armstrong, Chief Compliance Officer, if you did *not* receive Monument Capital Management, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Jessica Lydia Gibbs is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

## Item 2 Education Background and Business Experience

Jessica Lydia Gibbs was born in 1987. Ms. Gibbs graduated from Bryn Mawr College in 2009, with a Bachelor of Arts degree in political science. Ms. Gibbs has been with Monument Capital Management, LLC since April of 2015, as the Director of Private Wealth Design since March of 2019 and Vice President & Partner since July of 2021.

Ms. Gibbs is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

### 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 other investment-related businesses or occupations.

#### **Item 5 Additional Compensation**

Ms. Gibbs's annual compensation is based, in part, on the amount of assets under management that she introduces to the Registrant. Accordingly, she 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**

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## Item 1 Cover Page

A.

### **Emily Marie Harper**

Monument Capital Management, LLC

ADV Part 2B: Brochure Supplement

Dated: March 20, 2024

Contact: David Armstrong, Chief Compliance Officer  
1940 Duke Street, Suite 6100  
Alexandra, Virginia 22314

B.

**This Brochure Supplement provides information about Emily Marie Harper that supplements the Monument Capital Management, LLC Brochure; you should have received a copy of that Brochure. Please contact David Armstrong, Chief Compliance Officer, if you did *not* receive Monument Capital Management, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Emily Marie Harper is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

## Item 2 Education Background and Business Experience

Emily Marie Harper was born in 1989. Ms. Harper graduated from the University of Virginia in 2011 with a Bachelor of Arts degree in art history, and the Darden School of Business in 2021 with a Master of Business Administration degree. Ms. Harper has been a financial planning associate of Monument Capital Management, LLC since September of 2017, and has been Vice President & Partner since July of 2021. Ms. Harper was a registered representative of LPL Financial LLC from September of 2017 until December of 2018.

Ms. Harper is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

### 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 other investment-related businesses or occupations.

#### **Item 5 Additional Compensation**

Ms. Harper's annual compensation is based, in part, on the amount of assets under management that she introduces to the Registrant. Accordingly, she 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.

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## Item 1 Cover Page

A.

### **Erin Michael Hay**

Monument Capital Management, LLC

ADV Part 2B: Brochure Supplement

Dated: March 20, 2024

Contact: David Armstrong, Chief Compliance Officer  
1940 Duke Street, Suite 6100  
Alexandra, Virginia 22314

B.

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**Additional information about Erin Michael Hay is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

## Item 2 Education Background and Business Experience

Erin Michael Hay was born in 1987. Mr. Hay graduated from the University of Oklahoma in 2010, with a Bachelor of Business Administration degree in finance and entrepreneurship. Mr. Hay has been a Private Wealth Advisor and a Portfolio Manager of Monument Capital Management, LLC since August of 2019. From April of 2016 to July of 2019, Mr. Hay was a research associate at Compass Point Research & Trading, LLC. From July of 2011 to October of 2015, Mr. Hay was an analyst with JP Morgan Securities LLC and with JPMorgan Chase Bank NA.

Mr. Hay has been a CFA<sup>®</sup> Charterholder since 2015. CFA<sup>®</sup> designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst<sup>®</sup> (CFA<sup>®</sup>) 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 190,000 CFA<sup>®</sup> Charterholders working in over 170 countries and regions. To earn the CFA<sup>®</sup> 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.

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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 other investment-related businesses or occupations.

#### **Item 5 Additional Compensation**

Mr. Hay's annual compensation is based, in part, on the amount of assets under management that he introduces to the Registrant. Accordingly, he 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.

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## Item 1 Cover Page

A.

### Heaven Lee Goodwin

Monument Capital Management, LLC

ADV Part 2B: Brochure Supplement

Dated: March 20, 2024

Contact: David Armstrong, Chief Compliance Officer  
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Alexandra, Virginia 22314

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## Item 2 Education Background and Business Experience

Heaven Lee Goodwin was born in 1997. Ms. Goodwin graduated from Georgetown University in 2019, with a Bachelor of Science degree in finance. Ms. Goodwin has been employed by Monument Capital Management, LLC since June of 2019, and she is currently a Private Wealth Advisor. From January of 2018 to May of 2018 and from September of 2018 to December of 2018, Ms. Goodwin was an intern at Monument Capital Management, LLC.

Ms. Goodwin is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

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### Item 3 Disciplinary Information

None.

#### **Item 4 Other Business Activities**

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#### **Item 5 Additional Compensation**

Ms. Goodwin's annual compensation is based, in part, on the amount of assets under management that she introduces to the Registrant. Accordingly, she 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 Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, David Armstrong, 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 promoter 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. Armstrong at 703-504-9600.

## Item 1 Cover Page

A.

### **Cathleen DeRonja Phelps**

Monument Capital Management, LLC

ADV Part 2B: Brochure Supplement

Dated: March 20, 2024

Contact: David Armstrong, Chief Compliance Officer  
1940 Duke Street, Suite 6100  
Alexandra, Virginia 22314

B.

**This Brochure Supplement provides information about Cathleen DeRonja Phelps that supplements the Monument Capital Management, LLC Brochure; you should have received a copy of that Brochure. Please contact David Armstrong, Chief Compliance Officer, if you did *not* receive Monument Capital Management, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Cathleen DeRonja Phelps is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

## **Item 2 Education Background and Business Experience**

Cathleen DeRonja Phelps was born in 1967. Ms. Phelps graduated from The University of Virginia in 1989, with a Bachelor of Science degree in commerce. Ms. Phelps has been a Client Experience Manager of Monument Capital Management, LLC since February of 2015.

## **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 other investment-related businesses or occupations.

#### **Item 5 Additional Compensation**

Ms. Phelps's annual compensation is based, in part, on the amount of assets under management that she introduces to the Registrant. Accordingly, she 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 Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, David Armstrong, 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 promoter 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. Armstrong at 703-504-9600.

## Item 1 Cover Page

A.

### **Nathan Wade Tonsager**

Monument Capital Management, LLC

ADV Part 2B: Brochure Supplement

Dated: March 20, 2024

Contact: David Armstrong, Chief Compliance Officer  
1940 Duke Street, Suite 6100  
Alexandria, Virginia 22314

B.

**This Brochure Supplement provides information about Nathan Wade Tonsager that supplements the Monument Capital Management, LLC Brochure; you should have received a copy of that Brochure. Please contact David Armstrong, Chief Compliance Officer, if you did *not* receive Monument Capital Management, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Nathan Wade Tonsager is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

## Item 2 Education Background and Business Experience

Nathan Wade Tonsager was born in 1992. Mr. Tonsager graduated from the University of Wisconsin–Madison in 2016 with a Bachelor of Arts degree in economics. Mr. Tonsager has been a Portfolio Management Associate of Monument Capital Management, LLC since June of 2022. From May of 2018 to June of 2022, Mr. Tonsager was an investment adviser representative of Campbell Wealth Management. From October of 2018 and June of 2022, he was a registered representative of Madison Ave Securities. From May of 2018 to October of 2018, Mr. Tonsager was a registered representative of LPL Financial LLC. From June of 2017 to April of 2018, he was a Financial Solutions Advisor of Bank of America, N.A. and Merrill Lynch, Pierce, Fenner & Smith Inc.

Mr. Tonsager has held the Certificate in Investment Performance Measurement (CIPM) designation since 2021. The CIPM designation is awarded by the CFA Institute. The CIPM program develops and tests the performance evaluation and presentation expertise of investment

professionals. The two-level CIPM program is based on a self-directed curriculum that allows candidates to study and earn the credential while staying fully employed. To earn the certificate, a candidate must enroll and pass two exams, become a regular member of the CIPM Association, and meet professional experience requirements.

### **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 other investment-related businesses or occupations.

### **Item 5 Additional Compensation**

Mr. Tonsager's annual compensation is based, in part, on the amount of assets under management that he introduces to the Registrant. Accordingly, he 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 Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, David Armstrong, 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 promoter 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. Armstrong at 703-504-9600.