

Item 1 Cover Page

Registered As

Atwater Wealth Management, Inc.

Doing Business As: Atwater Wealth Management

Registered Investment Adviser

176 Federal Street, 5th Floor | Boston, Massachusetts | 02110

(617) 723-1439 - phone

(857) 350-3617 - fax

www.atwaterwealth.com

December 17, 2018

NOTICE TO PROSPECTIVE CLIENTS: READ THIS DISCLOSURE BROCHURE IN ITS ENTIRETY

All the material within this Brochure must be reviewed by those who are considering becoming a client of our firm. This Brochure provides information about the qualifications and business practices of Atwater Wealth Management, Inc. doing business as Atwater Wealth Management. If you have any questions about the contents of this Brochure, please contact us at (617) 723-1439 or cgaffney@atwaterwealth.com. Atwater Wealth Management's IARD firm number is 172749.

In accordance with federal and state regulations, this Brochure is on file with the appropriate securities regulatory authorities as required. The information provided within this Brochure is not to be construed as an endorsement or recommendation by state securities authorities in any jurisdiction within the United States, or by the United States Securities and Exchange Commission. 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. Registration of a registered investment adviser does not imply any level of skill or training. Additional information about Atwater Wealth Management also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

At least annually, this Item number will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our Brochure. We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

This document dated December 17, 2018, contains material changes since our previous Brochure dated March 22, 2018. The firm is now eligible for SEC registration and it is filing a conversion from State to SEC. Clarifications were made to the fee schedule (see Item 5).

Currently, our Disclosure Brochure may be requested by contacting us at the number listed on the cover page of this Brochure or at cqaffney@atwaterwealth.com. We welcome visitors to our website at www.atwaterwealth.com for a comprehensive overview of our firm and the professional services we offer.

Additional information about Atwater Wealth Management is also available via the SEC's website www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with Atwater Wealth Management who are registered, or are required to be registered, as investment adviser representatives of Atwater Wealth Management.

Item 3 – Table of Contents

Part 2A

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fee and Compensation	5
Item 6 – Performance-Based Fees and Side-by-Side Management	7
Item 7 – Types of Clients	7
Item 8 – Method of Analysis, Investment Strategies and Risk of Loss	7
Item 9 – Disciplinary Information	8
Item 10 – Other Financial Industry Activities and Affiliations	8
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	9
Item 12 – Brokerage Practices	9
Item 13 – Review of Accounts	11
Item 14 – Client Referrals and Other Compensation	12
Item 15 – Custody	12
Item 16 – Investment Discretion	13
Item 17 – Voting Client Securities	13
Item 18 – Financial Information	13
Item 19 – Requirements for State-Registered Advisers	13

Item 4 – Advisory Business

Atwater Wealth Management (“AWM,” “Atwater,” “the Firm,” “our,” or “we”) is an independent investment advisory firm. The firm’s founding member Caroline Gaffney started AWM in 2008 and organized the firm as a corporation in 2013. Atwater Wealth Management registered as an independent investment adviser in Massachusetts in 2014 until our effective date of registration with the SEC. Furthermore, we have also notice filed with Massachusetts and New Hampshire.

Atwater Wealth Management provides fee-only investment advisory services primarily to individual clients and high-net worth individuals.

Investment strategies and recommendations are tailored to the individual needs of each client. Although Atwater Wealth Management generally exercises limited investment discretion for each account that it advises, the portfolio composition within the same investment objective may, at any given time, differ as to composition. As a result, the performance of an account within a particular investment objective may differ from other accounts within that same investment objective. Clients should not expect that the performance of their portfolios will be identical to that of another client. These differences in portfolio composition are attributable to a variety of factors, including, but not limited to, the type of account, clients’ restrictions and guidelines, sizes and significant account activity (e.g., significant number of contributions and/or withdrawals).

In addition to investment advisory services, we also provide targeted financial advisory services on an as-needed basis. The financial advisory services include, but are not limited to, cash flow planning, retirement needs analysis, tax-efficient distribution strategies, gift and estate planning, insurance planning, annuity reviews, and education planning.

As of July 6, 2018, AWM has \$ 100,722,961 under management. Of this amount \$98,230,767 is managed on a discretionary basis, and \$2,492,194 is managed under a non-discretionary basis.

Asset Management

We have an affirmative duty of care, loyalty, honesty and good faith to act in the best interests of our clients. AWM must abide by honest and ethical business practices including, but not limited to:

- Not inducing trading in a client’s account that is excessive in size or frequency in view of the financial resources and character of the account;
- Making recommendations with reasonable belief that they are appropriate based on the information furnished by the client;
- Placing discretionary orders only after obtaining client’s written trading authorization contained within the advisory agreement or via separate amendment;
- Not borrowing money or securities from, or lending money or securities to a client;
- Not placing an order for the purchase or sale of a security if the security is not registered, or the security or transaction is not exempt from registration in the specific state;

We ensure that we will:

- Allocate securities in a manner that is fair and equitable to all clients.
- Not effect principal or agency-cross transactions for client accounts.

Wrap Fee Program

Atwater Wealth Management offers a Wrap Fee Program sponsored by LPL Financial as a platform, whereby Atwater Wealth Management pays the transaction charges for all of our clients who participate in AWM's wrap fee program. Clients participating in a wrap fee arrangement pay a single fee for advisory, brokerage and custodial services. Atwater does not pass this charge through to the client, nor does Atwater increase its fee in order to compensate for these charges. Atwater Wealth Management absorbs the transaction charges as a business expense. More information about the Wrap Fee Program can be found in our Wrap Fee Brochure ADV Part 2A, Appendix 1.

The overall cost you will incur if you participate in our wrap fee program may be higher or lower than you might incur by paying transaction costs separately. To compare the cost of the wrap fee program with non-wrap fee portfolio management services, you should consider the frequency of trading activity associated with our investment strategies, the brokerage commissions charged other broker/dealers, and the advisory fees charged by investment advisers. We will review with clients any separate program fees that may be charged to clients.

There is no difference in how wrap fee accounts are managed. All accounts are managed in the same manner, as disclosed in our Brochure ADV Part 2A and in our Wrap Fee Brochure ADV Part 2A, Appendix 1.

Hourly Consulting Services

Atwater Wealth Management may provide consulting services on an hourly or fixed fee basis. These services may include, as selected by the client in the consulting agreement, advice regarding tax planning, investment planning, retirement planning, estate planning, cash flow/budget planning, business planning, education planning, and personal financial planning. The services take into account information collected from the client such as financial status, investment objectives and tax status, among other data. AWM may or may not deliver to the client a written analysis or report as part of the services. Consulting fees are tailored to the individual needs of the client based on the investment objective chosen by the client. The engagement terminates upon final consultation with and/or delivery of written analysis or report to the client. The specific manner in which fees are charged is established in a client's written agreement with us.

Item 5 – Fees and Compensation

The specific manner in which fees are charged by the firm is established in a client's written agreement and account application between the client and Atwater Wealth Management and is based on the following fee schedule.

Fee Schedule:

Account Balance	Annual Advisory Fee%
First \$1,000,000.00	1.00%
Next \$1,000,001.00 - \$5,000,000.00	0.85%
Next \$5,000,001.00 - \$10,000,000.00	0.65%
Next \$10,000,001.00 +	0.45%

Our fees are payable quarterly, in advance. Fees are calculated based on the quarter end balance of the portfolio, as determined by the custodian, at the end of the previous quarter. We will generate invoices for all investment advisory clients on a quarterly basis. Each invoice reflects the amount to be debited by the custodian and paid to us for the upcoming quarter's investment advisory fee, per the Account Agreement signed by the client at the inception of the agreement. Our clients authorize the account custodian to debit their client account for the amount of our investment advisory fee. At the inception of the relationship and each quarter thereafter, we will notify your custodian of the amount of the fee due and payable to us through our fee schedule and contract. The custodian does not validate or check our fee, its calculation or the assets on which the fee is based. The custodian will "deduct" the fee from your account(s) or, if you have more than one account, from the account you have designated to pay our advisory fees.

Fees may be negotiable based on previous relationships and other factors, such as aggregate level of assets with our firm, anticipated future earnings capacity at our firm, anticipated future additional assets at our firm, account composition at our firm, negotiations with the client, etc. No increase in our fee(s) shall be effective without prior written notification to clients of at least thirty (30) days.

Each quarter you will receive a statement directly from your custodian showing all transactions, positions and credits/debits into or from your account; the statements after the quarter-end will reflect these transactions, including the advisory fee paid by you to us.

In some instances, we and the client may agree on a fee schedule different from that set forth above.

Fees for consulting and financial planning services are charged on an hourly or fixed fee basis. The maximum hourly fee to be charged to any client will not exceed \$400.00. Fixed fees range from \$2,500.00 to \$10,000. Fees for such services are negotiable. Fees are due upon execution of an Agreement with Atwater Wealth Management and we will deliver the financial plan and services within the first six months. The client generally makes a check payable to Atwater Wealth Management for consulting and financial planning services. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of the engagement. AWM is not under any obligation to repay any portion of the fees paid prior to the termination of this agreement. Lower fees for comparable services may be available from other sources.

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees

and commissions are exclusive of and in addition to Atwater's fee, and we do not receive any portion of these fees and costs.

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

Neither the firm or any supervised persons accepts performance-based fees, fees based on a share of capital gains on or capital appreciation of the assets of a client such as a hedge fund or other pooled investment vehicle.

Item 7 – Types of Clients

Atwater Wealth Management provides investment advice only to individuals and high net worth individuals.

We ordinarily require a minimum of \$1,000,000.00 in manageable assets in order to open and maintain an account. Exceptions may be made under certain circumstances (e.g., for related accounts and for the accounts of our personnel and their family members).

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

We emphasize continuous and regular account supervision. As part of our asset management service, we generally create a portfolio consisting of exchange traded funds ("ETFs"), mutual funds and separately managed accounts. We will also review and manage individual stocks or bonds, stock options, and other public and private securities or investments as appropriate.

The client's individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client's circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least quarterly and if necessary, rebalance the portfolio based upon the client's individual needs, stated goals and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

The firm uses a combination of fundamental and technical analysis in order to formulate investment advice when managing assets. Depending on the analysis, the firm will implement a long- or short-term trading strategy based on the particular objectives and risk tolerance of a particular client.

Fundamental analysis involves an evaluation of the financial condition and competitive position of a particular fund or issuer which typically involves an analysis of an issuer's management team, investment strategies, style, past performance, reputation and financial strength in relation to the asset class concentrations and risk exposures of the firm's model asset allocations. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, evolving market conditions may negatively impact the security.

Technical analysis involves the examination of past market data rather than specific issuer information in determining the recommendations made to clients. Technical analysis may involve the use of mathematical-based indicators and charts, such as moving averages and price correlations, to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. A substantial risk in relying upon

technical analysis is that identifying historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Atwater Wealth Management, Inc. will be able to accurately predict such a reoccurrence. Past performance does not guarantee future results and results will vary.

Please note, investing in securities involves risk of loss that clients should be prepared to bear. There are different types of investments that involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Past performance is not indicative of future results.

The firms' methods of analysis and investment strategies do not represent any significant or unusual risks. However, all strategies have inherent risks and performance limitations such as:

- **Market Risk:** the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.
- **Interest Rate Risk:** the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Credit Risk:** the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.

Item 9 – Disciplinary Information

Atwater Wealth Management has never been the subject of an investment-related or legal complaint. To the best of our knowledge, no employee has ever been the subject of an investment-related regulatory complaint or litigation.

Item 10 – Other Financial Industry Activities and Affiliations

Atwater Wealth Management is not engaged in any other financial industry activities other than giving investment and financial advisory advice. AWM does not sell products or services other than investment advice to its clients. AWM does not have any arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment adviser, financial planning firm, futures commission merchant, commodity pool operator, commodity trading adviser, bank or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer or an entity that creates or packages limited partnerships.

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

Atwater Wealth Management maintains a Code of Ethics, which serves to establish a standard of business conduct for all employees that are based upon fundamental principles of openness, integrity, honesty and trust.

The Code of Ethics includes guidelines regarding personal securities transactions of its employees and investment advisor representatives. The Code of Ethics permits employees and investment advisors or related persons to invest for their own personal accounts in the same or different securities that an investment advisor representative may purchase for clients in program accounts. This presents a potential conflict of interest because trading by an employee or investment advisor representatives in a personal securities account in the same or different security on or about the same time as trading by a client could potentially disadvantage the client. Atwater Wealth Management addresses this conflict of interest by requiring in its Code of Ethics that employees and investment advisor representatives report certain personal securities transactions and holdings to the Chief Compliance Officer for review.

An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction being implemented for an advisory account, thereby preventing an employee from benefiting from transactions placed on behalf of advisory accounts.

Neither Atwater Wealth Management nor a related person recommends to clients, or buys or sells for client accounts, securities in which AWM investment advisors, employees, or a related person has a material financial interest.

Item 12 – Brokerage Practices

Atwater Wealth Management will supervise and direct the investments of the client accounts subject to such limitations as the client imposes in writing, if any. With respect to the client's account and without prior consultation with the client, AWM will (a) direct the purchase, sale, exchange, conversion, and otherwise trade ETFs, mutual funds and other securities including money market instruments, (b) direct the amount of securities purchased, sold, exchanged, and otherwise traded; and (c) place orders for the execution of such securities transactions.

All client assets are held by third-party custodians. Atwater Wealth Management recommends that clients use LPL Financial to custody our client's assets. AWM does receive support services from LPL Financial, many of which assist Atwater Wealth Management to better monitor and service program accounts maintained at LPL Financial. These support services and/or products may be received without cost, at a discount, and/or at a negotiated rate, and may include the following:

- 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
- consulting services
- attendance at conferences, meetings, and other educational and/or social events
- marketing support
- computer hardware and/or software
- other products and services used by the firm in furtherance of its investment advisory business operations

These support services are generally available to independent investment advisors and are not the result of soft dollar arrangements or any other express arrangements with LPL Financial. Atwater Wealth Management will continue to receive the services regardless of the volume of client transactions executed with LPL Financial. Clients do not pay more for these support services as a result of this arrangement. There is no corresponding commitment made by Atwater Wealth Management to LPL Financial or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement.

As a result of receiving these services, Atwater Wealth Management may have an incentive to continue to use or expand the use of LPL Financial services. Our firm examined this potential conflict of interest when we chose to enter into the relationship with LPL and we have determined that the relationship is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

LPL Financial charges brokerage commissions and 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 debt securities transactions).

LPL Financial may charge ticket prices that are higher than another qualified broker-dealer might charge to effect the same transaction where we determine in good faith that the commission 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, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

LPL Financial is AWM's sole and exclusive broker-dealer to execute transactions in client accounts. Clients should understand that not all advisors require their clients to direct brokerage to one custodian. By directing brokerage to LPL Financial we may be unable to achieve the

most favorable execution of client transactions, which may cost clients more money. Additionally, we do not allow clients to direct brokerage away from LPL Financial.

Allocation of Investment Opportunities and Orders

We have adopted the following policies and procedures related to the fair allocation of investment opportunities. These policies are designed to help ensure that each client receives fair and equitable treatment in the investment process.

- Transactions in the same security on behalf of more than one client are aggregated, when possible, to facilitate best execution. This results in all clients within the aggregate receiving the same average share price on the transaction.
- When orders cannot be aggregated, we employ a trading process that is fair among all clients, regardless of size.
- Accounts in which our employees or affiliates have a beneficial interest, or accounts in which a conflict of interest exists, do not receive preferential treatment.
- All clients receive fair and equitable treatment for investment opportunities that are too limited to be effectively allocated among all accounts.

When orders are generated, the decision on which accounts should participate, and in what amount, is based on the type of security or other asset, the present or desired structure of the various portfolios and the nature of the client's goals. Other factors include risk tolerance, tax status, permitted investment techniques and, for fixed-income accounts, the size of the account and other practical considerations. As a result, we may have different price limits for buying or selling a security in different accounts. Portfolio information systems, portfolio reports and quality control reports permit us to consider these factors as appropriate.

When our investment professionals decide to sell a security regardless of tax considerations, both taxable and tax-deferred accounts are eligible for sale simultaneously. In situations where tax gains influence the sale, securities in the tax-deferred accounts may be placed for sale first, as additional time is needed to consider the tax implications for each taxable account. Conversely, when tax losses influence the sale, AWM may prioritize taxable clients first, as the loss has a specific impact in a given year. In any event, the prioritization process is applied consistently over time.

Item 13 – Review of Accounts

Atwater Wealth Management conducts account reviews on an ongoing basis. Accounts are reviewed under the direction and oversight of Caroline Gaffney, CEO, Chief Investment Officer, and Chief Compliance Officer. All investment supervisory clients are advised that it remains their responsibility to advise Atwater Wealth Management 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 AWM on at least an annual basis.

Account reviews may also be conducted based on the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and by client request.

The annual meeting may occur by phone, in person, via e-mail, or via video conference and documentation will be maintained to evidence that at a minimum the following topics were reviewed:

- Client's financial status
- Risk tolerance
- Time horizon
- Investment objective and goals
- Asset allocation and/or account holdings

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from their portfolio custodian. Atwater Wealth Management may also provide a written report summarizing account activity and performance.

Item 14 – Client Referrals and Other Compensation

Atwater Wealth Management does not have any agreements in place to pay solicitors a portion of advisory fees. Atwater Wealth Management does not directly or indirectly compensate any person who is not a supervised person for client referrals.

Item 15 – Custody

Atwater Wealth Management does not have custody of client funds or securities. LPL Financial serves as the custodian of client assets on behalf of Atwater Wealth Management.

LPL Financial as the custodian sends statements at least quarterly to clients showing all disbursements in account including the amount of the advisory fees paid to advisor, the value of client assets upon which advisor's fee was based, and the specific manner in which advisor's fee was calculated. Clients provide authorization to LPL Financial permitting advisory fees to be deducted from client advisory account. Atwater Wealth Management, utilizing a third-party billing software system, calculates the advisory fees and directs LPL to deduct them from client's account every quarter. In addition to the custodian statement, Atwater Wealth Management provides an investment statement at client meetings which includes performance and asset allocation information. You should compare the account statements you receive from LPL Financial with those you receive from us.

Atwater Wealth Management may also provide advisory services on assets held at different third-party custodians. There are certain securities that are held at third parties, and not at LPL Financial. For example, hedge funds and separately managed accounts are often held directly with the investment sponsor. For those outside positions, clients will receive confirmations and statements directly from the investment sponsor.

For outside positions not custodied at LPL Financial, LPL Financial may receive information (e.g., number of shares held and market value) from the investment sponsor and display that information on statements and reports prepared by LPL Financial. Such information also may be used to calculate performance in performance reports prepared by LPL Financial.

Item 16 - Investment Discretion

Discretionary Management

We receive limited discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. Such authority is provided in our contract with each client. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. Client investment guidelines may or may not limit the scope of potential investments. As a result, clients can impose restrictions on investing in certain securities or types of securities. When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions of the client. Investment guidelines and restrictions must be provided to us in writing.

Item 17 – Voting Client Securities

Atwater Wealth Management does not vote client proxies, but third-party money managers selected or recommended by our firm may vote proxies for clients. Clients will otherwise receive their proxies or other solicitations directly from their custodian. Clients may contact Atwater Wealth Management at the number listed on the cover page of this Brochure to discuss any questions they may have with a particular solicitation.

AWM does not accept authority to take action with respect to legal proceedings relating to securities held in the account.

Item 18 – Financial Information

Atwater Wealth Management does not require or solicit prepayment of more than \$1,200.00 in advisory fees per client, six months or more in advance.

There are no financial conditions that are reasonably likely to impair the firm's ability to meet contractual commitments to clients. At no time has Atwater Wealth Management been the subject of a bankruptcy petition.

Item 19 – Requirements for State Registered Advisers

We are an SEC registered investment adviser, so this section does not apply to us.