

RiversEdge Advisors, LLC

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RiversEdge Advisors

Form ADV Part 2A – Disclosure Brochure

Effective: December 17, 2024

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of RiversEdge Advisors, LLC dba RiversEdge Advisors (“RiversEdge Advisors” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (302) 573-6864.

RiversEdge Advisors is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through RiversEdge Advisors to assist you in determining whether to retain the Advisor.

Additional information about RiversEdge Advisors and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 298390.

**RiversEdge Advisors, LLC dba RiversEdge Advisors
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Item 2 – Material Changes

Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplements"). The Disclosure Brochure provides information about a variety of topics relating to an advisor's business practices and conflicts of interest. The Brochure Supplements provide information about Advisory Persons of RiversEdge Advisors.

RiversEdge Advisors believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. RiversEdge Advisors encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

The material changes in this brochure from the last annual updating amendment of RiversEdge Advisors on 02/29/2024 are described below. Material changes relate to RiversEdge Advisors' policies, practices or conflicts of interests.

- RiversEdge Advisors is affiliated with RiversEdge Business Services LLC, dba RiversEdge Tax & Advisory, through common control and ownership. – Item 10

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of RiversEdge Advisors.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 298390. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (302) 573-6864.

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Item 4 – Advisory Services

A. Firm Information

RiversEdge Advisors, LLC dba RiversEdge Advisors (“RiversEdge Advisors” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). RiversEdge Advisors is organized as a limited liability company under the laws of the State of Delaware. RiversEdge Advisors was founded in August 2018 and is owned and operated by Brian J. Carney and Jarrett F. Morris. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by RiversEdge Advisors. For questions regarding this Disclosure Brochure, please contact Jarrett Morris at (302) 573-6864.

B. Advisory Services Offered

RiversEdge Advisors offers advisory services to individuals, high net worth individuals, families, trusts, estates, businesses retirement plans and insurance companies (each referred to as a “Client”). RiversEdge Advisors provides a comprehensive approach to its wealth advisory services. Services are tailored to the unique needs of each Client.

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. RiversEdge Advisors’ fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

RiversEdge Advisors provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and related advisory services. RiversEdge Advisors works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an investment strategy. The Advisor may retain legacy investments based on portfolio fit and/or tax considerations.

The Advisor’s investment philosophy is based primarily on modern portfolio theory. The Advisor will develop a strategic asset allocation for the Client based on the Client’s unique situation. The Advisor will then construct an investment portfolio primarily utilizing exchange-traded funds (“ETFs”). The Advisor may also incorporate open-end mutual funds, individual equity securities and/or individual fixed income securities in a Client’s portfolio. For mutual funds, the Advisor primarily selects passive managers and will seek institutional share classes when available.

RiversEdge Advisors will select, recommend and/or retain mutual funds on a fund by fund basis. Due to specific custodial and/or mutual fund company constraints, material tax consideration, and/or systematic investment plans, RiversEdge Advisors will select, recommend and/or retain a mutual fund share class that does not have trading costs, but do have higher internal expense ratios than institutional share classes. RiversEdge Advisors will seek to select the lowest cost share class available that is in the best interest of each Client and will ensure the selection aligns with the Client’s financial objectives and stated investment guidelines.

RiversEdge Advisors typically employs a long-term investment approach for Clients, but may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. RiversEdge Advisors will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

RiversEdge Advisors provides “robo-advisory” portfolio management services through Schwab’s online interface. This entails the use of algorithm-based portfolio management advice, rather than in-person investment advice. These automated investment solutions are customized to each client and based on individual characteristics, such as the client’s age, risk tolerance, income, and current assets, among others. RiversEdge Advisors’ investment advisory personnel oversee the algorithm but may not monitor each client’s account. Clients are encouraged to update their account/questionnaire with any change in their objectives, risk tolerance, or other pertinent information, as that information factors into the portfolio’s composition.

RiversEdge Advisors may also provide ongoing advice on assets held away at custodians with which RiversEdge Advisors does not have a relationship. This includes direct management of 401ks, 403bs, 529 plans, and other

assets where RiversEdge Advisors has discretion and may leverage an Order Management System to implement allocation or rebalancing strategies on behalf of the client. The client securely logs into the order management system and allows RiversEdge Advisors to manage accounts without taking custody of assets. RiversEdge Advisors regularly reviews the current holdings and available investment options in these accounts, monitors the accounts, rebalances and implements RiversEdge Advisors' strategies as necessary. In limited circumstances, RiversEdge Advisors provides ongoing advice for non-discretionary, held-away accounts.

Financial Planning Services

RiversEdge Advisors will typically provide to its Clients a variety of financial planning services. Financial planning services may be included in an overall wealth management engagement or provided as a separate service, pursuant to the terms of the agreement with the Client. Services may be provided in several areas of a Client's financial situation, depending on their goals and objectives. Planning may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, distributions, personal savings, education savings, spending, insurance needs, estate planning, charitable strategies, and other areas of a Client's financial situation. RiversEdge Advisors may deliver specific planning modules to the Client or a comprehensive plan, based on the needs of the Client.

In certain circumstances, RiversEdge Advisors may also refer Clients to an accountant, attorney or other specialist, as appropriate for the Client's unique situation. For certain financial planning engagements, the Advisor will generally provide a written report that contains observations and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary.

Financial planning recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

Combined Services

In some circumstances, RiversEdge Advisors will provide Clients with a combination of both investment management and financial planning services. RiversEdge Advisors has established four service packages to be used as guidelines for what services will be available to the Client under these engagements. Service packages will generally be assigned to Clients based on assets under management ("AUM") and Clients will designate a service package within their Investment Advisory & Financial Planning Services Agreement. The service packages below represent the specific services the Client will have access to under each engagement. Any minimum AUM requirements below are negotiable and may be waived. Service packages include:

- **Launch:** Launch is made available to all Clients and does not impose a minimum AUM. Services include: Assessment of Investment Objectives and Financial Goals, Budgeting and Cash Flow Management, Current Portfolio Evaluation, Creating an Investment Policy Statement (IPS), Investment Program Implementation and Optimization, Performance Reporting and Attribution Analysis, Tax Alpha/Tax Loss Harvesting, Customized Strategies Across Public Investment Products, Real Estate Acquisition and Exit Planning, Employee Benefits Coordination and Planning, Income Tax Efficiency Analysis and Recommendations, Financing Options, and Retirement Planning.
- **Accel:** Accel is generally made available to Clients with AUM of \$2,000,000 - \$5,000,000. Services include: All Launch services, plus Collaborative Suite of Tools for Client Account Integration and Monitoring, Risk Management and Insurance, Trust and Estate Planning, Separately Managed Account (SMA) Search and Evaluation, and Private Financing Network.
- **Maximize:** Maximize is generally made available to Clients with AUM of \$5,000,000 - \$10,000,000. Services include: All Launch & Accel services, plus Customized Strategies Across an Extended List of Investment Products, Access to full non-public market investment options, Philanthropy and charitable gift planning, Multi-Generational Education, and Coordination with existing client partners (accounting, legal, etc.).
- **Thrive:** Thrive is generally made available to Clients with AUM greater than \$10,000,000. Services include: All Launch, Accel & Maximize services, plus an Annual Tax Planning Workbook and a Dedicated Partner and Senior Team.

Retirement Plan Advisory Services

RiversEdge Advisors provides retirement plan advisory services on behalf of the retirement plans (each a "Plan")

and the company (the “Plan Sponsor”). The Advisor’s retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education
- Investment Policy Statement (“IPS”) Design and Monitoring
- Investment Oversight Services (ERISA 3(21))
- Investment Management Services (ERISA 3(38))
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance

RiversEdge Advisors may provide investment advisory services on behalf of the Plan and Plan Sponsor, which may be in either a 3(21) or 3(38) context depending on whether or not the Advisor is also providing discretionary investment management over the Plan assets. For 3(38) services, the Advisor shall have the discretion to select the investments for the Plan and/or make investment decisions on behalf of Plan Participants.

These services are provided by RiversEdge Advisors serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of RiversEdge Advisors’ fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

Orion Cash & Credit Program

The Orion Cash & Credit Program is offered through Focus Orion Solutions, LLC and allows advisors doing business with Orion to offer lending and cash management solutions that integrate with Orion’s advisor and client portals. Orion Cash & Credit includes access to a range of securities-backed and insurance premium finance lines of credit, commercial and business loans, and mortgages, as well as FDIC-insured deposit programs. These solutions are made available through Orion’s financial institution partners.

Business Advisory Services

RiversEdge Advisors offers consulting services to businesses tailored to address the specific needs requested by the business. These services are not considered investment advisory services and therefore may, at times, be provided by employees of RiversEdge who are not investment adviser representatives of RiversEdge. The agreed upon services will be outlined in the agreement and may include assistance in operational matters, business cash flow forecasting, accounting, tax planning, or human resource support. The fees for these services will vary depending on the scope of the services being provided and will be assessed on a retainer, fixed, or hourly fee basis.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

C. Client Account Management

Prior to engaging RiversEdge Advisors to provide advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – RiversEdge Advisors will work with each Client to develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – RiversEdge Advisors will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – RiversEdge Advisors will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – RiversEdge Advisors will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

RiversEdge Advisors does not manage or place Client assets into a wrap fee program.

E. Assets Under Management

As of December 31, 2023, RiversEdge Advisors manages \$594,419,925 in Client assets, \$593,474,536 of which are managed on a discretionary basis and \$945,389 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of RiversEdge Advisors and the Client.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the investment advisory agreement. Quarterly fees are calculated based on the daily average balance.

Our advisory fee is tailored to each client based on the services provided and relevant factors, typically as a percentage of assets under management and/or advisement. The fee can range up to 2.50% per annum and applies to all discretionary and non-discretionary assets under management and advisement, unless agreed otherwise with the client. Clients who receive financial planning and consulting services from us in addition to investment advisory services may be subject to an extra fee, which may be added to the advisory fee or billed separately. For consulting and reporting services, the structure and level of fees are determined based on the services provided and other relevant factors. We may also agree to 'household' client accounts for fee calculation based on the client relationship and services provided. All fee arrangements are negotiable, and the client's agreement outlines the applicable fees.

The investment advisory fee in the first month of service is prorated from the inception date of the Client's account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by RiversEdge Advisors will be independently valued by the Custodian. RiversEdge Advisors will not have the authority or responsibility to value portfolio securities.

Clients may make additions to and withdrawals from their account[s] at any time, subject to RiversEdge Advisors' right to terminate an account. Additions may be in cash or securities provided that RiversEdge Advisors reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets on notice to RiversEdge Advisors, subject to the usual and customary securities settlement procedures. However, RiversEdge Advisors designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a Client's investment objectives. RiversEdge Advisors may consult with its Clients about the options and ramifications of transferring securities. However, Clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

The advisory fee explained above includes RiversEdge Advisors' held-away account services through the Pontera online platform for direct management of 401ks, 403bs, 529 plans, and other assets for which RiversEdge Advisors does not have custody and are held at custodians other than Schwab. Client investment management fees for such held-away accounts will be deducted from an account under RiversEdge Advisors' management held at Schwab. Fees are based on the assets within these accounts according to the valuation of the accounts at the close of the quarter as valued by

the account custodian. RiversEdge Advisors strongly encourages Client to confirm the market values for accuracy against Client's custodian statements.

Clients have the option to have fees billed directly to their checking or savings accounts. RiversEdge utilizes Bluepay to bill clients on a quarterly basis.

Financial Planning Services

Financial planning and consulting fees of the Firm are typically charged on fixed fee basis, hourly rate basis, or as a percentage per annum for services provided at any asset level, depending on the level and scope of services required and the professional providing them. Asset-based fees can range up to 0.25%. Fixed fees can range up to \$20,000. Hourly fees can range up to \$1,000 per hour. Tax consulting and preparation services may also be included as part of the financial planning fee or investment advisory fee. All fee arrangements are open to negotiation.

Combined Services

RiversEdge Advisors will generally charge fees for combined services based on the terms outlined under Investment Management Services above.

Retirement Plan Advisory Services

3(21) Advisory Services

Fees for retirement plan advisory services are charged a fixed fee or asset-based fee of up to 2.50% per annum and are billed quarterly, at the end of each calendar quarter, based on the fair market value of Plan assets supervised by the Advisor at the end of the quarter. The fees in the first quarter of the Agreement shall be prorated from the inception date to the end of the first quarter.

3(38) Advisory Services

Fees for retirement plan advisory services are charged an annual fixed or asset-based fee of up to 2.50% per annum. The specific billing method for these fees varies and therefore will be outlined in the Agreement. These fees are billed either monthly or quarterly, at the end of each period and may be based on the period-end balance or an average balance. The fees in the first billing period of the Agreement shall be prorated from the inception date to the end of the first billing period.

All retirement plan advisory fees may be negotiable depending on the size and complexity of the Plan.

Orion Cash & Credit Program

Fees under the Orion Cash & Credit Program will vary depending on the financial product selected. The Advisor receives annual payments from Orion equal to 25% of the eligible revenue earned and received by Orion with respect to RiversEdge's clients utilizing the program. This creates a conflict of interest because the Advisor has an incentive to recommend products through this program. The Advisor will not recommend financial products under this program unless it is in the client's best interest.

B. Fee Billing

Investment Management Services

Clients provide written authorization permitting advisory fees to be deducted by RiversEdge Advisors to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian. Fees are calculated based on the daily average balance of the assets under management in the account[s] and is calculated at the end of each calendar quarter.

Financial Planning Services

Fees for financial planning may be paid via check, credit card/ACH or deducted from the advisory account. Client will select payment method within the agreement. Fees are due upon completion of services.

Combined Services

RiversEdge Advisors will generally charge fees for combined services based on the terms outlined under Investment Management Services above.

Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than RiversEdge Advisors, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all securities execution and custody fees charged by the Custodian, if applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for certain mutual funds and other types of investments. The fees charged by RiversEdge Advisors are separate and distinct from these custody and execution fees.

In addition, all fees paid to RiversEdge Advisors for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. The Client should review both the fees charged by the fund[s] and the fees charged by RiversEdge Advisors to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information. Additionally, as noted above, the Advisor will select share classes which do not have trading costs, but do have higher internal expense ratios than institutional share classes. Please refer to Item 12 – Brokerage Practices for additional information.

D. Payment of Fees and Termination

Investment Management Services

RiversEdge Advisors is compensated for its investment advisory services at the end of the quarter in which investment advisory services are rendered.

Financial Planning Services

RiversEdge Advisors is compensated for financial planning services upon completion of services.

Combined Services

RiversEdge Advisors is compensated for its combined services at the end of the quarter in which services are rendered.

Retirement Plan Advisory Services

RiversEdge Advisors is compensated for its retirement plan advisory services at the end of the billing period, after advisory services are rendered.

Either party may terminate the investment advisory, financial planning or retirement plan agreement, at any time, by providing advance written notice to the other party. Upon termination, the Client shall be responsible for investment advisory fees up to and including the effective date of termination.

E. Compensation for Sales of Securities

RiversEdge Advisors does not buy or sell securities to generate commissions and does not receive a portion of the fees paid by Clients for securities transactions.

Jarrett Morris is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In one's separate capacity as a registered representative of PKS, Mr. Morris will implement securities transactions under PKS and not through RiversEdge Advisors. In such instances, Mr. Morris will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by Mr. Morris in his capacity as a registered representative is separate from and in addition to RiversEdge Advisors' advisory fees. This practice presents a conflict of interest because Mr. Morris is a registered representative has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by Mr. Morris. Neither the Advisor nor Mr. Morris will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Morris's separate capacity as a registered representative. Please see Item 10 - Other Financial Industry Activities and Affiliations.

Certain Advisory Persons are also licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by Advisory Persons are separate and in addition to advisory fees. This practice

presents a conflict of interest because persons providing investment advice on behalf of the Advisor, who are insurance agents have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on the Client's needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Advisor. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

RiversEdge Advisors does not charge performance-based fees for its investment advisory services. The fees charged by RiversEdge Advisors are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

RiversEdge Advisors does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

RiversEdge Advisors offers advisory services to individuals, high net worth individuals, families, trusts, estates, businesses, and retirement plans.

RiversEdge Advisors generally does not impose a minimum size for establishing a relationship. However, certain investments and strategies may require certain minimums for effective implementation.

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

A. Methods of Analysis

RiversEdge Advisors primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from RiversEdge Advisors are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, RiversEdge Advisors generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. RiversEdge Advisors will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, RiversEdge Advisors may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. RiversEdge Advisors will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Below are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Robo-Advisory Services Risks

Robo-advisory services use algorithms as the basis of the management process. Risks of this approach include, but are not limited to, that the algorithm might rebalance client accounts without regard to market conditions, that the accounts may be automatically rebalanced on a more frequent basis or a less frequent basis than the client might expect, and that the algorithm may not address prolonged changes in market conditions. Additionally, clients should be aware that responses to the adviser's suitability questionnaire are typically the sole basis for the portfolio's allocation.

Options Risks

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a "naked" or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving RiversEdge Advisors or its management persons RiversEdge Advisors values the trust Clients place in the Advisor. The Advisor encourage Clients to perform the requisite due diligence on any advisor or service provider with whom the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's name or CRD# 298390.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

As noted in Item 5, Mr. Morris is also a registered representative of PKS. In Mr. Morris's separate capacity as a registered representative, Mr. Morris will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Morris of RiversEdge Advisors. Neither RiversEdge Advisors nor Mr. Morris will earn ongoing investment advisory fees in

connection with any services implemented in the Mr. Morris's separate capacity as a registered representative. Under supervision by PKS, PKS may have access to certain confidential information of the Client, including, but not limited to financial information, investment objectives, transactions and holdings information.

Insurance Agency Affiliations

As noted in Item 5, certain Advisory Persons of RiversEdge Advisors will serve as licensed insurance professionals. Implementations of insurance recommendations are separate and apart from an Advisory Person's role with RiversEdge Advisors. As insurance professionals, Advisory Persons will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending insurance products. Clients are under no obligation to implement any recommendations made the Advisor or by its Advisory Persons.

RiversEdge Tax & Advisory

RiversEdge Advisors is affiliated with RiversEdge Business Services LLC, dba RiversEdge Tax & Advisory, through common control and ownership. If Clients require tax and accounting services, RiversEdge Advisors will recommend that Clients use the services of the affiliate. RiversEdge Advisor's advisory services are separate and distinct from the compensation paid to RiversEdge Tax & Advisory for its services. This affiliated firm is otherwise regulated by the professional organizations to which it belongs and must comply with the rules of those organizations.

This arrangement with an affiliated entity presents a conflict of interest because RiversEdge Advisors has a direct or indirect financial incentive to recommend an affiliated firm's services. While RiversEdge Advisors believes that compensation charged by the affiliated firm is competitive, such compensation may be higher than fees charged by other firms providing the same or similar services. Clients are under no obligation to use the services of any firm RiversEdge Advisors recommends, whether affiliated or otherwise, and may obtain comparable services and/or lower fees through other firms.

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

A. Code of Ethics

RiversEdge Advisors has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with RiversEdge Advisors ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. RiversEdge Advisors and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of RiversEdge Advisors associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (302) 573-6864.

B. Personal Trading with Material Interest

RiversEdge Advisors allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. RiversEdge Advisors does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. RiversEdge Advisors does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

RiversEdge Advisors allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by RiversEdge Advisors requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to

detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While RiversEdge Advisors allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. At no time will any associated person of RiversEdge Advisors, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

RiversEdge Advisors does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize RiversEdge Advisors to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, RiversEdge Advisors does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where RiversEdge Advisors does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by RiversEdge Advisors. As its Advisory Persons are also registered representatives of PKS, RiversEdge Advisors and its Advisory Persons are limited in the Custodians in which they can recommend to Clients.

RiversEdge Advisors will generally recommend that Clients establish their account[s] at SEI or Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". Schwab may enable the Advisor to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Schwab may be higher or lower than those charged by other financial institutions. The Advisor maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. RiversEdge Advisors does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian, but does receive economic benefits from Schwab. Please see Item 14 below.

2. Brokerage Referrals -RiversEdge Advisors does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where RiversEdge Advisors will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). RiversEdge Advisors will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required. RiversEdge Advisors will execute its transactions through the Custodian, unless otherwise instructed in writing by the Client.

RiversEdge Advisors may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This

must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Principals of the Advisor and periodically by the CCO. The CCO also has oversight of investment advisory processes. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client. Clients are offered an annual financial plan, subject to scope of their agreement with the Advisor.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify RiversEdge Advisors if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by RiversEdge Advisors

RiversEdge Advisors does not receive securities commissions from product sponsors, broker-dealers or any unrelated third party. RiversEdge Advisors may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, RiversEdge Advisors may receive referrals of new Clients from a third-party.

Participation in Institutional Advisor Platform

RiversEdge Advisors has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like RiversEdge Advisors. As a registered investment advisor participating on the Schwab Advisor Services platform, RiversEdge Advisors receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services and financial support to RiversEdge Advisors that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. RiversEdge Advisors believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

With regard to SEI, RiversEdge has access to a variety of economic benefits, services, and products in connection with RiversEdge's use of SEI's investment adviser platform. The terms and availability of these benefits vary among advisors on the SEI platform (including RiversEdge) depending on the business conducted with SEI and other factors. These services generally help RiversEdge conduct its advisory business, but each specific benefit does not necessarily benefit each client.

Beyond access to SEI investment products, these include conferences, seminars and other educational and networking activities, business entertainment, reimbursement of travel and attendance expenses, research and other investment support services (such as client proposal and other financial planning support), technical and operational solutions (including the SEI Wealth Platform), marketing assistance (including joint marketing designed to promote SEI investment products), compliance services, human resources consulting, risk management/insurance assistance, front office, middle office, back office and other administrative support (including providing clerical staff to assist in the completion of required paperwork), SEI attendance at client meetings, information technology services, continuity and succession planning, access to financing and banking options, trust services, portfolio reporting, automatic rebalancing, tax loss harvesting, waiver or payment of certain fees (including paying account transfer fees or other charges that RiversEdge or its clients would incur when changing service providers), vendor discounts, discount pricing on SEI services, and broader practice management consulting. These benefits may be provided via SEI, its affiliates, or third parties and may be made available to RiversEdge at no fee, at a discounted fee, or via financial compensation provided by SEI. Some of these offerings depend on RiversEdge conducting a minimum amount or type of current or expected future business with SEI, or having a minimum account size or amount of assets under management with SEI or invested in SEI investment products. Certain of these services or products, including those provided by or paid for by SEI, may be used by RiversEdge in connection with its general business activities, in addition to supporting RiversEdge's interaction with SEI systems. The benefits, services, products, or payments discussed herein may be significant to RiversEdge and create an incentive for the RiversEdge to utilize SEI services or investment products for its customers rather than other service providers or investment products. However, RiversEdge strives at all times to put the interests of its clients first, including when selecting custodians or investment products for clients. RiversEdge is independently owned and operated; it is not affiliated with SEI.

B. Client Referrals from Solicitors

The Advisor may retain third parties to act as solicitors for RiversEdge's investment management services. All compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. RiversEdge will ensure each solicitor is properly registered in all appropriate jurisdictions, if required. All such referral activities will be conducted in accordance with Rule 206(4)-1 under the Advisers Act, where applicable.

Item 15 – Custody

RiversEdge Advisors does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct RiversEdge Advisors to utilize the Custodian for the Client's security transactions. RiversEdge Advisors encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 below.

Item 16 – Investment Discretion

RiversEdge Advisors generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by RiversEdge Advisors. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by RiversEdge Advisors will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

RiversEdge Advisors does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither RiversEdge Advisors, nor its management, have any adverse financial situations that would reasonably impair the ability of RiversEdge Advisors to meet all obligations to its Clients. Neither RiversEdge Advisors, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. RiversEdge Advisors is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

Form ADV Part 2B – Brochure Supplement

for

**Brian J. Carney, CFP®, ChFC®, AIF®, CDFA™
Partner & Founder**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Brian J. Carney (CRD# 4447761) in addition to the information contained in the RiversEdge Advisors, LLC dba RiversEdge Advisors (“RiversEdge Advisors” or the “Advisor”, CRD# 298390) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the RiversEdge Advisors Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (302) 573-6864.

Additional information about Mr. Carney is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4447761.

Item 2 – Educational Background and Business Experience

Brian J. Carney, born in 1979, is dedicated to advising Clients of RiversEdge Advisors as Partner & Founder. Mr. Carney earned a Bachelor of Science from Ursinus College in 2001. Additional information regarding Mr. Carney's employment history is included below.

Employment History:

Partner & Founder, RiversEdge Advisors, LLC	12/2024 to Present
Partner, RiversEdge Tax & Advisory	08/2024 to Present
Chief Executive Officer, RiversEdge Advisors, LLC	02/2024 to 12/2024
Partner, RiversEdge Advisors, LLC	09/2018 to 02/2024
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	09/2018 to 11/2019
Investment Advisor Representative, Cambridge Investment Research Advisors, Inc.	01/2014 to 09/2018
Registered Representative, Cambridge Investment Research, Inc.	01/2014 to 09/2018
Investment Advisor Representative, Newton One Advisors LLC	10/2010 to 12/2013
Registered Representative, M Holdings Securities, Inc.	04/2009 to 12/2013
Financial Advisor, Securian Financial Services, Inc. dba Diamond State Financial Group	10/2001 to 02/2009

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (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 71,000 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 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); 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.

Chartered Financial Consultant® (“ChFC®”)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

Accredited Investment Fiduciary (“AIF®”)

The AIF® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company.

The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

Since October 2002, the Accredited Investment Fiduciary® (AIF®) designation has been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

Certified Divorce Financial Analyst (“CDFA™”)

The Certified Divorce Financial Analyst™, (CDFA™) is a professional certification granted in the United States and Canada by the Institute for Divorce Financial Analysts™ (IDFA™). To attain the right to use the CDFA™ (Certified Divorce Financial Analyst™) certification, an individual must satisfactorily fulfill the following requirements:

- Education – Professionals must develop their theoretical understanding and knowledge of the financial aspects of divorce by completing a comprehensive course of study approved by the IDFA™;
- Examination – Practitioners must pass a four-part (in the USA) or three-part (in Canada) Certification Examination that tests their understanding and knowledge of the financial aspects of divorce. In addition, the practitioner must demonstrate the practical application of this knowledge in the divorce process;
- Experience – Individuals must have a minimum of three years' experience in a financial or legal capacity prior to earning the right to use the CDFA™ certification mark; and
- Ethics – Practitioners agree to abide by a strict code of professional conduct known as the “Code of Ethics and Professional Responsibility,” which sets forth their ethical responsibilities to the public, clients, employers and other professionals. The IDFA™ may perform a background check during this process, and each candidate for CDFA™ certification must disclose any investigations or legal proceedings relating to his or her professional or business conduct.

Individuals who become certified must complete the following ongoing education requirements in order to maintain the right to continue to use the CDFA™ designation:

- Continuing Education – Complete a minimum of fifteen (15) hours of continuing education every two years, that are specifically related to the field of divorce, and
- Ethics – Practitioners must voluntarily disclose any public, civil, criminal, or disciplinary actions that may have been taken against them during the past two years as part of the renewal process. If a complaint has been brought against a CDFA™ by another professional or member of the general public, the CDFA™ must be examined and cleared by IDFA's Ethics Committee to maintain their designation.

Item 3 – Disciplinary Information

Securities laws require an advisor to disclose any instances in the past 10 years where the Advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. There no disclosures to make for this Item. However, the Advisor encourages Clients to independently view the background of Mr. Carney on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4447761.

Item 4 – Other Business Activities

Mr. Carney is a partner of RiversEdge Business Services LLC, dba RiversEdge Tax & Advisory, an affiliated tax and accounting firm. From time to time, he may offer clients advice or products from this activity and clients should be aware that these services involve a conflict of interest. RiversEdge Advisors always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any representative of RiversEdge Advisors in such individual's outside capacities.

Insurance Agency Affiliations

Mr. Carney is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart Mr. Carney's role with RiversEdge Advisors. As an insurance professional, Mr. Carney will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Carney is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Carney or the Advisor.

Item 5 – Additional Compensation

Mr. Carney has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Carney serves as a Partner & Founder of RiversEdge Advisors and is supervised by Jarrett Morris, the Chief Compliance Officer. Mr. Morris can be reached at (302) 573-6864.

RiversEdge Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of RiversEdge Advisors. Further, RiversEdge Advisors is subject to regulatory oversight by various agencies. These agencies require registration by RiversEdge Advisors and its Supervised Persons. As a registered entity, RiversEdge Advisors is subject to examinations by regulators, which may be announced or unannounced. RiversEdge Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Jarrett F. Morris
Partner, Founder and Chief Compliance Officer

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jarrett F. Morris (CRD# 5146654) in addition to the information contained in the RiversEdge Advisors, LLC dba RiversEdge Advisors (“RiversEdge Advisors” or the “Advisor”, CRD# 298390) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the RiversEdge Advisors Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (302) 573-6864.

Additional information about Mr. Morris is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5146654.

Item 2 – Educational Background and Business Experience

Jarrett F. Morris, born in 1983, is dedicated to advising Clients of RiversEdge Advisors as a Partner, Founder and the Chief Compliance Officer. Mr. Morris earned a B.S. in Finance from University of Delaware in 2005. Additional information regarding Mr. Morris' employment history is included below.

Employment History:

Partner, Founder and Chief Compliance Officer, RiversEdge Advisors, LLC	12/2024 to Present
Partner, RiversEdge Tax & Advisory	08/2024 to Present
Chief Operating Officer and Chief Compliance Officer	02/2024 to 12/2024
Partner and Chief Compliance Officer, RiversEdge Advisors, LLC	09/2018 to 02/2024
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	09/2018 to Present
Investment Advisor Representative, Cambridge Investment Research Advisors, Inc.	12/2012 to 09/2018
Registered Representative, Cambridge Investment Research, Inc.	12/2012 to 09/2018
Financial Advisor, Securian Financial Services, Inc. dba Diamond State Financial Group	04/2006 to 12/2012

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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 71,000 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 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); 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.

Chartered Financial Consultant® (“ChFC®”)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning

needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

Accredited Investment Fiduciary ("AIF®")

The AIF® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company.

The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

Since October 2002, the Accredited Investment Fiduciary® (AIF®) designation has been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

Item 3 – Disciplinary Information

Securities laws require an advisor to disclose any instances where the Advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Morris.*** However, the Advisor encourages Clients to independently view the background of Mr. Morris on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5146654.

Item 4 – Other Business Activities

Mr. Morris is a partner of RiversEdge Business Services LLC, dba RiversEdge Tax & Advisory, an affiliated tax and accounting firm. From time to time, he may offer clients advice or products from this activity and clients should be aware that these services involve a conflict of interest. RiversEdge Advisors always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any representative of RiversEdge Advisors in such individual's outside capacities.

Broker-Dealer Affiliation

Mr. Morris is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In Mr. Morris' separate capacity as a registered representative, Mr. Morris will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Morris. Neither the Advisor nor Mr. Morris will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Morris' separate capacity as a registered representative.

Insurance Agency Affiliations

Mr. Morris is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Morris' role with RiversEdge Advisors. As an insurance professional, Mr. Morris will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Morris is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations

made by Mr. Morris or the Advisor.

Item 5 – Additional Compensation

Mr. Morris has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Morris serves as a Partner, Founder and the Chief Compliance Officer of RiversEdge Advisors. Mr. Morris can be reached at (302) 573-6864.

RiversEdge Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of RiversEdge Advisors. Further, RiversEdge Advisors is subject to regulatory oversight by various agencies. These agencies require registration by RiversEdge Advisors and its Supervised Persons. As a registered entity, RiversEdge Advisors is subject to examinations by regulators, which may be announced or unannounced. RiversEdge Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.