
Item 1. Form ADV Part 2A

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Firm Brochure – Form ADV Part 2A

This Brochure provides information about the qualifications and business practices of Sunset Advisers, LLC (hereinafter, “we,” “our,” the “Firm” or “Sunset”). Sunset operates the investment advisory services for the Sunset investment site. If you have any questions about the contents of this brochure, please contact us at the above email or telephone number. 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. Sunset is a registered investment adviser. Registration as an investment adviser does not imply any special degree of skill or training, or any sort of approval by any regulatory authority of an adviser’s investment methods.

Additional information about Sunset can be found on the Investment Adviser Public Disclosure website at adviserinfo.sec.gov by using our identification number referred to as a CRD number. Sunset’s CRD No. is 334116. If you have any questions about the content of this brochure, please contact us at the email address or telephone number shown above.

Item 2. Material Changes

Sunset is required to identify material changes that are made to this Brochure since the last version was produced and will provide you with a summary of such changes. We will also reference the date of our last annual update of our brochure. We may provide this Item 2 in a separate document accompanying the brochure.

As this is our initial Form ADV, there are no material changes to report at this time.

For future filings, this section of the Disclosure Brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this Brochure on the SEC’s public disclosure website (IAPD) at adviserinfo.sec.gov.

We may update this Disclosure Brochure at any time and send a copy to you with a summary of material changes or send you only a summary of material changes that includes an offer to send you a copy of the full brochure either by electronic means (email) or in hard copy form.

If you would like another copy of this Disclosure Brochure, please download it from the SEC website as indicated above or from the Sunset website or request it by emailing legal@sunsetapp.com.

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Item 4. Advisory Business and Services

A. Advisory Business

Sunset is an investment advisory firm with a principal place of business in Sandy, UT. We provide clients with software-based investment advisory and portfolio management services. The company was formed in November 2024, as a Limited Liability Company in Delaware. It is a wholly owned subsidiary of Sunset Software, Inc. Information regarding ownership and control persons of Sunset Software, Inc. is provided in Part 1 of our Form ADV, which is available online at www.adviserinfo.sec.gov or at www.sunsetapp.com. We encourage visiting our website, www.sunsetapp.com, for additional information.

Sunset operates an interactive website through which clients can consolidate and manage investment accounts owned by a deceased parent or spouse. The consolidation and management process is automated by our software.

Clients and users may contact Sunset for technical and customer service issues via email at legal@sunsetapp.com.

B. Services

Sunset offers limited advisory services to its clients. We help our customers consolidate and manage accounts owned by a deceased parent or spouse, through our software. Our clients are individuals who tend to have a low risk appetite and a long time horizon.

The specific methodology for the securities to be included in our portfolios over time and other information about each portfolio is included on our website, which clients should review before investing. Clients have the ability to connect a pre-existing brokerage account to Sunset or enable Sunset to discover other pre-existing brokerage accounts and allow us to notify the clients' chosen broker-dealers of the clients' instruction to replicate the holdings in one or more of our portfolios. The investments and cash in each client's account are not held with Sunset, but rather at the brokerage accounts that they have connected to the website.

Our relationship with the client is governed by our Investment Advisory Agreement, which outlines the responsibilities of both the client and Sunset.

Account opening

Upon opening an account for a client, Sunset will collect data regarding the client's investment objectives and risk tolerance. Some of the data may be provided by the answers the client previously provided to the client's broker-dealer (which must be confirmed by the client upon opening a Sunset account), and some of which may be obtained directly from the client. Following initial collection, clients will be able to update this data on Sunset's app. These data include information regarding a client's investment objectives, investment horizon, downturn tolerance, overall risk tolerance, and questions around income and net worth (the "Client Questionnaire"). Sunset generally classifies clients as "Risk Tolerant", "Moderate", or "Risk Averse".

Sunset does not use any data other than that which is obtained via the Client Questionnaire when assessing risk tolerance or providing investment advice.

Clients should understand that Sunset's own systems, as well as those of the client's brokerage provider, place certain limitations on the volume of trading notifications that Sunset can issue and trade instructions that the brokerage provider can execute.

Suitability alerts

Sunset provides limited advisory services. As such, we recognize that investments based on our portfolios are often only part of a client's overall investment strategy. If a client selects a portfolio with an investment suitability score different from that of the client, the client will be required to review both the investment suitability score of the portfolio as well as the client's own investment suitability score. The client will also be required to acknowledge both scores and confirm the client's desire to still invest in that portfolio.

Certain transactional costs associated with purchase and sale transactions in the client's account will still be paid by the client, such as wire transfer fees, transaction fees for the purchase or sale of securities, expenses related to the use of margin, the fees (including expense ratios) charged to shareholders of mutual funds or ETFs, short-term redemption fees, mark-ups and mark-downs, spreads, odd-lot differentials, paper statement fees, fees charged by regulatory agencies, exchange fees, American Depositary Receipt fees, Automated Customer Account Transfer Service fees, transfer taxes, and fees required by law. These fees will be charged by the client's chosen broker-dealer, but not charged by Sunset.

Monitoring

Sunset monitors the client's investment suitability metrics on an annual basis. If the investment suitability score of either the client or a portfolio in which the client is invested changes, we will alert the client to the change and ask the client to confirm whether the client still wishes to be invested in that portfolio. We do not do any other kind of monitoring or review. The client will receive confirmations from the client's brokerage provider / account custodian after trades are executed in the client's account. The client will also receive statements at least quarterly from the client's account custodian.

Sunset's services are not intended to serve as a substitute for a client's comprehensive financial plan. Sunset recommends its clients also seek the advice of an accountant or financial advisor.

Sunset does not provide accounting, tax, or legal advice to its clients.

Item 5. Fees and Compensation

Sunset charges an Advisory Fee based on a percentage of assets under management, as well as a fixed Integration Fee per account integration ("Integration"). An Integration is deemed as a connection between Sunset and a specific broker-dealer that the client gives Sunset authority to advise.

The Advisory Fee charged is a 1% fee on assets under management. We charge this fee monthly in arrears and define assets under management for the fee calculation as the average daily balance of assets over the month for which the fee has accrued.

The Integration Fee charged is \$10/month per Integration. We charge this fee monthly in arrears.

We deduct fees from the Client's advisory account. Clients pay the fees even if they do not have any transactions. Sunset reserves the right to charge clients less.

The specific Advisory Fee and Integration Fee charged by the Firm for its advisory services will be outlined in each client's Investment Advisory Agreement.

Each time a client uses our advisory services, they reaffirm their agreement that we may charge their account for the specified period. In the event that we cannot charge fees to the client's account, we reserve the right to terminate their access to our advisory services.

After signing up, a client may terminate the agreement through the site at any time. At the time of termination, any accrued fees that have not been yet charged will be charged prior to account termination and withdrawal.

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

Performance-based fees are fees based on a share of capital gains on or capital appreciation of the client's assets. Side-by-side management occurs when advisers manage both accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee. We do not engage in performance-based fees or side-by-side management.

Item 7. Account Requirements and Types of Clients

Clients participating in advisory services offered by Sunset are individuals. Sunset does not require a minimum investment.

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

Advisory services offered by Sunset are sponsored by the Firm. From time to time, Sunset may also offer portfolios provided by other registered investment advisers.

Sunset provides limited advisory services. As discussed in Item 4, these advisory services are intended only to help clients discover and consolidate accounts owned by a deceased relative. This service relies on information provided by the client. Clients certify on an annual basis that the information they have submitted is accurate and agree to promptly update Sunset should it become inaccurate in the future. However, Sunset does not collect individualized information regarding every aspect of a client's personal financial situation, and, therefore, there may be important client information not considered by Sunset. Clients should be aware of this limitation when considering Sunset's limited advisory services.

Sunset does not engage in holistic financial planning. Our advice is limited to the construction and maintenance of the specific products that we offer.

A. Risk of Loss

There are always risks to investing. All clients should be aware that all investments are subject to the potential loss of their entire investment, which clients should be prepared to bear.

When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. The following risks may not be all-inclusive but should be considered carefully by a prospective client before retaining our services.

1. General Risks

It is impossible to describe all possible types of risks which may affect investments. Some general risks associated with investing include, but not limited to, the following:

Concentration Risk. To the extent a portfolio is concentrated in assets related to a particular industry or geographic region, the portfolio will be subject to additional volatility risks associated with such industry or region. In addition, concentrating in a single industry or group of industries may make you more susceptible to any single economic, market, political or regulatory occurrence affecting that industry or group of industries.

Market Risk. Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.

Currency Risk. Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Interest Rate Risk. Movements in interest rates may directly cause prices of fixed income securities to fluctuate. For example, rising interest rates can cause "high quality, relatively safe" fixed income investments to lose principal value.

Credit Risk. Credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client. For example, if debt obligations held by an account are downgraded by ratings agencies or go into default, or if management action, legislation or other government action reduces the ability of issuers to pay principal and interest when due, the value of those obligations may decline, and an account's value may be reduced. Because the ability of an issuer of a lower-rated or unrated obligation (including particularly "junk" or "high yield" bonds) to pay principal and interest when due is typically less certain than for an issuer of a higher-rated obligation, lower rated and unrated obligations are generally more vulnerable than higher-rated obligations to default, to ratings downgrades, and to liquidity risk.

Purchasing Power Risk. Purchasing power risk is the risk that an investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.

Maturity Risk. The value of bonds or notes may change from the time of issuance to the time of maturity. Generally speaking, maturity risk increases as the length of time until maturity increases.

Liquidity Risk. Liquidity is the ability to readily convert an investment into cash. For example, Treasury Bills are highly liquid, while real estate properties are not. Some securities are highly liquid while others are highly illiquid. Illiquid investments carry more risk because it can be difficult to sell them.

Political Risk. Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.

Natural Disaster/Epidemic Risk. Natural or environmental disasters, such as earthquakes, fires, floods, hurricanes, tsunamis and other severe weather-related phenomena generally, and widespread disease, including pandemics and epidemics, have been and can be highly disruptive to economies and markets. These disruptions could prevent Sunset from executing advantageous trading decisions in a timely manner and negatively impact the ability to achieve client investment objectives.

New and Disruptive Technologies Risk. A client may invest in companies with assets that rely on older, sustaining or little to no technology, in which case, the value of any such assets could be adversely impacted by competitors developing and/or utilizing new, disruptive technologies. Further, competitors may implement such disruptive technologies over a period of time during which the market, including Sunset, is not aware of, or has access to, such developments. As a result, any investment that does not utilize such technologies may be at a competitive disadvantage and, as a result, the implementation of such technologies may have a material adverse effect on such investment or may even lead to an entire asset class becoming obsolete. A client may also invest in companies with assets that use newly developed, less proven technologies. There is no guarantee that such new technologies will perform as anticipated, especially in a field of rapidly changing technologies. The failure of a technology to perform as anticipated or its obsolescence, due to the development and utilization of new and disruptive technologies or otherwise, may materially and adversely affect the performance of certain portfolio companies that invest in or use such technologies and certain portfolio companies that do not benefit from such technologies.

Third-Party Vendor Risk. We rely on other companies to provide services for our products, including broker-dealers of clients. We depend on third-party vendors to meet our contractual obligations to our customers and conduct our operations. Our ability to meet our obligations to our customers may be adversely affected if vendors do not provide the agreed upon services in compliance with customer requirements and in a timely and cost-effective manner. Our vendors may be unable to quickly recover from natural disasters and other events beyond their control and may be subject to additional risks such as financial problems that limit their ability to conduct

their operations. The risk of these adverse effects may be greater in circumstances where we rely on only one or two vendors for a particular service.

Regulatory Risk. Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.

Risks Related to Investment Term. If the client requires a liquidation of their portfolio during a period in which the price of the security is low, the client will not realize as much value as they would have had the investment had the opportunity to regain its value, as investments frequently do, or had it been able to be reinvested in another security.

Horizon and Longevity Risks. The risk that your investment horizon is shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time that the markets are down, you may lose money. Longevity Risk is the risk of outliving your savings. This risk is particularly relevant for people who are retired or are nearing retirement.

Business Risk. Many investments contain interests in operating businesses. Business risks are risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

Financial Risk. Many investments contain interests in operating businesses. Excessive borrowing to finance a business' operations decreases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Default Risk. This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.

Cybersecurity Risk. There is cybersecurity risk with the increased use of technologies such as the Internet to conduct business. Sunset and its service providers are susceptible to operational, information security, and related risks. In general, cyber incidents can result from deliberate attacks or unintentional events. Cyber attacks include, but are not limited to, gaining unauthorized access to digital systems for purposes of misappropriating assets or sensitive information, corrupting data, or causing operational disruption. Cyber incidents affecting us, or our service providers have the ability to cause disruptions and impact business operations, potentially resulting in financial losses, impediments to trading, the inability of clients to transact business, violations of applicable privacy and other law. While both we and our service providers have established business continuity plans in the event of such cyber incidents, there are inherent limitations in such plans and systems including the possibility that certain risks have not been identified. Furthermore, we are unable to control the cyber security plans and systems put in

place by our service providers or any other third parties whose operations may affect us and or its clients. As a result, Sunset and its clients could be negatively impacted.

2. Specific Risks

There are also risks related to recommendation of specific types of securities. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment. A description of the types of securities we may recommend and some of their inherent risks are provided below.

Limited Scope of Investment Advice Risk. Clients should be aware that the investment advisory services provided by Sunset do not constitute a complete investment program and that there is additional risk inherent in the limited scope of advisory services provided by Sunset. Each individual client's investments could be subject to greater risk of loss and could be more volatile than a portfolio of investments that is more diversified across a greater number of assets, securities or sectors. Although diversification does not ensure a profit or protect against a loss, individual clients are encouraged to diversify their investments across a variety of industries, company sizes and geographic areas.

Mutual Fund and Exchange Traded Fund ("ETF") Risk. Mutual funds and exchange traded funds ("ETF") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

Theme-Specific Risk. This risk is inherent in investment strategies that focus on specific macroeconomic or geopolitical themes. Such strategies aim to capitalize on trends or developments in particular areas, like emerging technologies, demographic shifts, or geopolitical events. The risk arises from the possibility that the chosen theme may not unfold as expected, or may take longer to materialize, leading to potential underperformance. Additionally, the analysis and selection of equities within a thematic portfolio are crucial. If the fundamental research identifying these equities is inaccurate or if the quantitative methods used for portfolio optimization do not effectively isolate the specific risks associated with the theme, the portfolio may be exposed to unintended risks. This risk is compounded by the fact that thematic investing often involves a concentration in certain sectors or industries, making the portfolio more

susceptible to sector-specific downturns or disruptions. Furthermore, themes are often based on forward-looking projections and speculations, which can be highly uncertain and subject to rapid change due to new information or global events. Therefore, while thematic investing can offer opportunities for targeted exposure to potential growth areas, it also requires careful consideration of the uncertainties and specific risks associated with each theme.

Software Risk. Software Risk arises from the reliance on technology to create, manage, and track investment portfolios, introducing an added layer of complexity and operational challenges. The use of software in investment management can lead to vulnerabilities such as programming errors, system malfunctions, or cybersecurity threats that could disrupt trading activities, delay reporting, or lead to incorrect calculations and data. These technological issues could adversely affect the execution of the investment strategy, potentially resulting in inaccurate portfolio allocations or compliance issues. Furthermore, the dependence on complex software requires continuous updates, specialized technical expertise, and rigorous oversight to prevent errors and minimize downtime. An additional risk emerges if key personnel managing the software lack the necessary training or if inadequate internal controls are in place. Consequently, managing Software Risk demands meticulous system testing, robust cybersecurity protocols, and comprehensive contingency plans to safeguard portfolio integrity and maintain seamless investment operations.

API Risk. API (Application Programming Interface) Risk involves the potential disruptions and uncertainties associated with relying on APIs to connect with clients' brokerage accounts for executing trades and managing portfolios. Since the APIs that interface with brokerages can be unofficial or unstable, there is a risk that these connections may cease to function without warning, potentially hindering clients' trades from accurately tracking the intended portfolio strategies. Such disruptions could lead to delays, discrepancies in trade execution, or complete disconnection from brokerages, resulting in clients missing out on timely market opportunities or experiencing unintentional shifts in their investment exposure. Furthermore, brokerages might update their APIs, discontinue support, or impose new restrictions, further complicating automated trading and management processes.

Lack of Diversification Risk. While diversification is generally an objective of our clients, there can be no assurance as to the degree of diversification, if any, that will be achieved in any client investments. Difficult market conditions or slowdowns affecting a particular asset class, geographic region or other category of investment could have a significant adverse impact on a client if its investments are concentrated in that area, which would result in lower investment returns. This lack of diversification may expose a client to losses disproportionate to market declines in general if there are disproportionately greater adverse price movements in the particular investments. If a client holds investments concentrated in a particular issuer, security, asset class or geographic region, such client may be more susceptible than a more widely diversified investment. Accordingly, a lack of diversification could adversely affect a client's investment performance.

Item 9. Disciplinary Information

Sunset is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures to report in response to this Item.

Item 10. Other Financial Industry Activities and Affiliations

Sunset does not have a related person that is:

- A broker-dealer, municipal securities dealer or government securities dealer or broker
- An investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)
- An investment adviser or financial planner
- A futures commission merchant, commodity pool operator or commodity trading advisor
- A banking or thrift institution
- An Accountant or accounting firm
- A law firm
- An insurance company or agency
- A pension consultant
- A real estate broker or dealer
- A sponsor or syndicator of limited partnerships.

Sunset manages client accounts in accordance with the clients’ risk profile and uses automated algorithms to monitor client accounts quarterly, only for suitability based on their responses to the suitability questionnaire. On a quarterly basis, Sunset asks clients to review their suitability.

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

Sunset, its management, and supervised persons (collectively “personnel”), subscribe to a Code of Ethics. The Code of Ethics is designed to comply with the investment advisory laws and regulations that require firms to act as fiduciaries in transactions with their clients. The Firm’s inherent fiduciary duty requires that the Firm act solely in its clients’ best interest and adhere to standards of utmost integrity in its communications and transactions. These standards ensure that clients’ interests are preeminent.

Accordingly, Sunset has implemented policies, guidelines, and procedures that promote ethical practices and conduct by all of the Firm’s personnel. The Firm’s Code of Ethics specifies and prohibits certain types of transactions deemed to create conflicts of interest (or perceived conflicts of interest) and establishes reporting requirements and enforcement procedures relating to personal transactions by its personnel. The Code of Ethics, which specifically addresses professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes the Firm’s standards for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. The Firm will provide a copy of the complete Code of Ethics to any client or prospective client upon request.

1. Proprietary Trading

Sunset and its personnel are permitted to and do buy or sell securities for their own accounts that are included in one or more portfolios, consistent with the Firm's policies and procedures. This presents a conflict of interest because it may be possible for us or our personnel to receive more favorable prices than our clients. We will document any transactions that could be construed as a conflict of interest. To mitigate this conflict of interest, we will monitor trading reports of Sunset personnel for adherence to our Code of Ethics.

2. Participation or Interest in Client Transactions

The Firm does not recommend that clients buy or sell securities in which it or a related person may have a material financial interest.

Item 12. Brokerage Practices

We do not receive research or other products or services (i.e., soft dollar benefits) from a broker-dealer or a third party in connection with any client securities transactions, including with respect to sending trade notifications on behalf of clients.

We do not receive client referrals or compensation of any kind from any broker-dealers or other third parties in exchange for using any particular broker-dealer. However, in the future, we may receive compensation from broker-dealers making their services available to our clients.

We do not buy or sell securities on behalf of clients, and as such we do not block trade or aggregate purchases or sales of securities. When the rebalance of a Portfolio will require trades in multiple clients' accounts, we will send notifications to each client's broker-dealer on a randomized basis.

Item 13. Review of Accounts

Sunset is continuously accessible by clients through its website. Periodic account statements are sent by a client's chosen broker-dealer and not by Sunset itself.

We review client accounts using various methods. This includes an annual review of rebalancing transactions followed by an annual review of accounts using an algorithm.

Outside of this, we do not review client accounts.

Item 14. Client Referrals and Other Compensation

Sunset does not currently engage in the use of client testimonials and endorsements under the SEC's Marketing Rule, though it reserves the right to do so in the future.

Item 15. Custody

Sunset does not currently maintain custody of any client assets or funds.

Item 16. Investment Discretion

Sunset has discretionary authority, pursuant to its written Investment Advisory Agreements with client(s), to determine, without obtaining specific client consent, the securities to be bought or sold, the amount of the securities to be bought or sold, and the time when securities may be purchased or sold.

Item 17. Voting Client Securities

Sunset does not participate in proxy voting on behalf of clients. Our clients are responsible for directing their own proxies solicited by issuers of securities. Clients are responsible for making elections relative to mergers, acquisitions, tender offers, bankruptcy proceedings and other type events pertaining to the securities in your account. Proxy and other solicitation information will be sent to clients by the brokerage they connect to Sunset. Clients may not contact us with questions about a particular solicitation. Please follow the instructions for proxy voting included in the mailing.

Item 18. Financial Information

Sunset does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered.

We do not have a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients and we have not been the subject of a bankruptcy petition at any time during the past ten years.