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## **Firm Brochure**

(Part 2A of Form ADV)

This brochure provides information about the qualifications and business practices of Springboard Asset Management, LLC. If you have any questions about the contents of this brochure, please contact us at: 203-651-7110, or by email at: [info@springboardasset.com](mailto:info@springboardasset.com). 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.

Additional information about Springboard Asset Management, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

February 2024

## Material Changes

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The Material Changes section of this brochure will be updated annually when material changes occur from the previous release of the Firm Brochure.

The following material changes were made to this brochure for the last annual update in March 2024. In addition, certain other non-material updates have been made to the brochure to supplement existing disclosure regarding Springboard's advisory business and associated conflicts of interest.

- **Item 5 – Fees and Compensation**

- Fees for Investment Management Services has been amended to include a combined household minimum of \$250,000 of assets under management is required and that the account minimum size may be waived.

- **Item 7 – Types of Clients**

- Fees for Investment Management Services has been amended to include a combined household minimum of \$250,000 of assets under management is required and that the account minimum size may be waived.
- Springboard updated its assets under management as of December 31, 2023 to approximately \$109,412,566 in discretionary assets.

- **Item 12 – Brokerage Practices**

- Included subsection Directed Brokerage to describe Springboard's brokerage practice.

- **Brokerage Supplement**

- Reformatted ADV Part 2B Brochure Supplement for Charles M. Green and Rebecca D. Green.

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## Brochure Supplement (Part 2B of Form ADV)

Charles M. Green, CFP®, Principal

Rebecca D. Green, CFP®, Principal

## Advisory Business

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Springboard Asset Management LLC (“Springboard”) is a fee-only investment management and financial planning firm founded in 2010. Its principal owners are Charles M. Green, CFP® and Rebecca D. Green, CFP®. Charles has been in the investment management and financial planning business since 1989 and Rebecca since 1997. The firm is registered with the Securities & Exchange Commission (“SEC”). Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

## Investment Management Services

Springboard provides investment management services customized to the individual needs of each client. Through personal discussions, Springboard assists the client in developing goals and objectives. Springboard then develops a client’s personal investment policy, creates a portfolio based on that policy and gives continuous investment advice to the client. Portfolio management is guided by the stated objectives of the client.

Springboard manages a portfolio consisting of one or all of the following:

- Cash and Cash Equivalents including money market funds and short-term bank certificates of deposit;
- Fixed Income (bond mutual funds, exchange traded funds, individual bonds, and/or bank certificates of deposit) which may include U.S. government and agency, municipal, international, inflation protected and corporate bonds;
- U.S. large, mid/small growth and value equities (stock mutual funds, exchange traded funds and/or individual stocks);
- International large, mid/small growth and value equities and emerging markets equities (stock mutual funds, exchange trades funds and/or individual stocks); and
- Real assets (REIT and/or real asset mutual funds or exchange traded funds).

Springboard allocates the client’s assets among various investments in accordance with the client’s Investment Policy Statement. Portfolio weighting among funds and asset classes will be determined by each client’s individual needs and circumstances. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client’s behalf. Clients will retain individual ownership of all securities.

## Financial Planning

Personal financial planning includes informal consultations, segmented plans, and comprehensive plans. The planning process involves interviews with the client, a review of pertinent documents and, if engaged to do so, the preparation of a written plan based on the client’s goals and objectives.

A comprehensive plan consists of the following where applicable:

- Clarifying and prioritizing goals
- Cash management
- Retirement planning
- Education planning
- Risk management
- Estate planning
- Investment planning

Springboard gathers information from new clients through in-depth personal interviews and, in most cases, a completed client questionnaire. Information gathered includes a client's future goals, current financial situation, and attitudes towards risk. All information supplied by the client, including any supplemental documents, is reviewed and analyzed.

Financial planning will often involve a team approach including professional advisers such as insurance agents, attorneys, and CPAs. The client has complete discretion to implement some or all of the plan's recommendations.

## **Fees and Compensation**

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Springboard's services are provided on a fee only basis. Springboard does not sell financial products or accept commissions or any other compensation from outside sources.

### **Fees for Financial Planning Services**

Springboard estimates and quotes financial planning fees prior to clients engaging our services, in determining fees Springboard considers:

- Time and effort involved
- Complexity of the issues involved
- Involvement of other professional advisors
- Extra costs such as organizing client data and travel
- Time constraints imposed by the client's situation.

Fifty percent (50%) of the quoted financial planning fee will be due upon signing a contract with our firm. The balance of the fee will normally be billed upon the presentation of the Plan. Springboard will never hold client funds greater than \$500 for more than six months in advance.

Provided that all information needed to prepare the financial plan has been promptly provided by the client, a financial plan will be presented to the client within 90 days of the contract date.

Financial planning fees will range from \$500 to \$5,000 depending on the anticipated complexity thereof.

### **Fees for Investment Management Services**

Fees for investment management services will be charged based on a percentage of assets under management, per the following schedule. The portfolio management fee is calculated by applying different rates to different portions of the portfolio.

The first \$250,000	(\$0 to \$250,000)	1.00%
The next \$250,000	(\$250,001 to \$500,000)	.90%
The next \$500,000	(\$500,001 to \$1,000,000)	.80%
The next \$1,000,000	(\$1,000,001 to \$2,000,000)	.60%
The remainder	(\$2,000,001 and up)	.50%

A combined household minimum of \$250,000 of assets under management is required for this service with a minimum annual fee of \$1,000. Minimum account size may be waived, and fees are negotiable under certain circumstances which could include reductions due to family member discounts or reduced complexity in the management services required.

Springboard will provide a specific fee schedule to each client. Fees for individual accounts for members of the same family, (defined as spouses/partners and dependent children, and trusts for the benefit of such family members), are based on the total account balance of all family accounts.

Fees are computed and billed quarterly in arrears and are based upon the value (market value or fair market value in the absence of market value), plus any credit balance or minus any debit balance of the client's account on the last day of the calendar quarter. For the first partial quarter of management, the fees will be prorated by using the average daily portfolio balance as the measure of portfolio worth for billing purposes.

Investment advisory agreements are effective for one year beginning the date the contract is signed and shall be automatically renewed for successive one-year terms. A client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Springboard's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. For example, some mutual fund transactions may produce a transaction charge that will be deducted from the client's account. Similarly, trades through custodians may create other transaction charges that will also be deducted from the client's account. Some custodians may charge custodial fees that may be deducted from the client's account.

Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Springboard's fee, and Springboard shall not receive any portion of these commissions, fees, and costs.

Springboard processes trades through:

- Charles Schwab & Co., Inc.
- Other agreed-upon money manager/broker dealer or custodial entities.

## **Performance-Based Fees**

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Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Springboard does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## **Types of Clients**

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Springboard generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations or business entities.

A combined household minimum of \$250,000 of assets under management is required for the investment management service. Minimum account size may be waived, and fees are negotiable under certain circumstances.

As of December 31, 2023, Springboard manages approximately \$109,412,566 in discretionary assets under management, and \$0 is managed on a non-discretionary basis.

## **Methods of Analysis, Investment Strategies and Risk of Loss**

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### **Investment Strategies**

The primary investment strategy used on client accounts is strategic asset allocation based on academically identified allocation strategies. This means that we diversify our portfolios in accordance with the principles of Modern Portfolio Theory and weight sub-asset classes based on correlation factors and with a small/value tilt. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

### **Method of Analysis**

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that Springboard may use include Morningstar mutual fund information, Morningstar stock information, vendor-provided research and information, and the World Wide Web.

### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **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.

- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These 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.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases 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.
- **ETF and Mutual Fund Risk.** ETF and mutual fund investments bear additional expenses based on a pro-rata share of operating expenses, including potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities held by the ETF or mutual fund. Clients may also incur brokerage costs when purchasing ETFs.
- **Pandemic Risk.** Disease outbreaks (epidemics and pandemics) can materially and adversely impact the investments as businesses deal with core decreases in business activities such as staffing shortages, supply chain issues and more in the local, state, national and global economy, and instability in the marketplace. Advisor has a business continuity plan in place to ensure and maintain normal business operations to service clients.

## Disciplinary Information

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The firm and its employees have not been involved in legal or disciplinary events related to past or present clients.



## Other Financial Industry Activities and Affiliations

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Springboard is an investment advisory firm registered with the SEC.

Springboard has no arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

## Code of Ethics

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Springboard has adopted a Code of Ethics pursuant to Rule 204A-1 under the Investment Advisers Act of 1940 and is predicated on the principle that Springboard owes a fiduciary duty to its clients. Through its Code of Ethics, Springboard sets forth the high ethical standards that we require of our employees, including compliance with applicable federal securities laws. As a fiduciary, Springboard has a duty of utmost good faith to act solely in the best interests of each of our clients. Our clients entrust us with their funds, which in turn places a high standard on our conduct and integrity. Our fiduciary duty compels all employees to act with the utmost integrity.

Springboard's Code of Ethics includes:

- Standards of business and personal conduct
- Protection of our clients,' nonpublic, confidential information, and
- Personal trading policies for our employees.

Employees are also expected not to divulge information regarding Springboard's securities recommendations or client securities holdings to any individual outside of the firm, except as required in the normal conduct of business (for example, communications with brokers and custodians).

Employees are required to report securities transactions and holdings for all accounts in which the employee has a direct or indirect beneficial ownership interest. This includes personal securities information of any family member living within the same household as the employee.

Springboard nor its employees have any material financial interest in the securities it recommends to its clients.

Springboard employees are allowed to invest in the same securities that are recommended to clients. The securities recommended by Springboard are primarily shares of mutual funds and ETFs. They are generally not "reportable securities," and as such the Springboard Code of Ethics does not ordinarily limit the ability of Springboard's employees to invest in the same open-end mutual funds and ETFs that are recommended to clients. All employees of Springboard are prohibited from profiting at the expense of clients and competing with clients with respect to transactions in "reportable securities" as defined in Rule 204A-1(e) (10) under the Investment Advisers Act of 1940.

Springboard does not buy or sell securities for client's accounts at or about the same time it buys the same securities for its own account.

Our code also includes oversight, enforcement, and recordkeeping provisions.

A copy of Springboard's Code of Ethics is available to advisory clients upon request.

## Brokerage Practices

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### Directed Brokerage

Springboard primarily recommends transactions in mutual funds and ETFs. As such, Springboard does not recommend broker-dealers for client transactions. Springboard would seek best execution of client transactions were it to choose a broker-dealer to execute client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction but the best overall qualitative execution in the particular circumstance. Transactions in mutual fund shares are affected directly between a client's custodian and the mutual fund or its agents. Because such transactions are, pursuant to Rule 22c-1 under the Investment Company Act of 1940, required to be affected at a price based on the net asset value of such shares next computed after the order to purchase or sell such shares is received, and clients do not pay any sales loads in connection with such transactions, a price based on the net asset value of the mutual fund shares next computed after the order to purchase or sell such shares is received will be the most favorable trade execution reasonably available.

At present, Springboard has a relationship with Charles Schwab. Schwab is operationally set up to maintain client accounts, and each client selects his or her own custodian. In selecting its custodian, each client will be deemed to have directed Springboard to affect any transactions in ETF shares and other individual securities through such broker as the client's custodian may from time to time direct.

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transactions by considering the back-office services, technology and pricing of services offered.

Springboard does not receive fees or commissions from any of these arrangements.

Springboard does not in any way direct clients to a broker dealer or custodian for the exchange of products, research, services, or for client referrals.

**Products and services available to us from Schwab** Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business.

Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

**Services that benefit you** Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

**Services that do not directly benefit you** Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab's own and that of third parties. We use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab.

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

**Services that generally benefit only us** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Publications and conferences on practice management and business succession

**Schwab provides some of these services itself** In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides us with other benefits, such as occasional business entertainment of our personnel. If you did not maintain your account with Schwab, we would be required to pay for these services from our own resources. Our representatives and staff utilize services, tools, software and resources which benefit our firm to help us grow our business. This is a potential conflict of interest. We believe, however, that our selection of utilizing Schwab, CS & Co. as a custodian and broker is in the best interest of our clients. Our selection is supported by the scope, quality and pricing of services available to our clients.

**Our interest in Schwab's services** The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate, our recommendation of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us.

## Soft Dollar

We have no arrangements currently under which products or services other than execution of securities transactions are obtained by an adviser, from or through a broker-dealer, in exchange for the adviser's directly client trades to the broker-dealer.

## **Review of Accounts**

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The accounts within Investment Management Services are continuously monitored by Charles M. Green, CFP® and Rebecca D. Green CFP®, Principals. Additional reviews may be performed when portfolios are rebalanced, when new funds are added to the portfolios, when unexpected withdrawals are requested, and when portfolios are reviewed for tax efficiency opportunities. Accounts are reviewed in the context of each client's stated investment objectives and guidelines as well as changes in the client's individual circumstances.

In addition to the monthly or quarterly statements and confirmations of transactions that investment management clients receive from their custodian, Springboard will provide quarterly status reports detailing performance and portfolio positions.

## **Client Referrals and Other Compensation**

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Springboard has been fortunate to receive client referrals. The referrals came from current clients, accountants, employees, personal friends of employees or other similar sources. The firm does not compensate referring parties for these referrals; however, a nominal gift may be provided and subject to our gift policy.

Springboard Asset Management, LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

We do not receive any economic benefit including, but not limited to, commissions, equipment, research services, sales awards and/or prizes from any non-client in connection with giving advice to clients.

## **Custody**

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We do not maintain custody of client assets.

All assets are held by qualified custodians, and the custodians provide account statements directly to clients at their address of record at least quarterly.

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Springboard.

## **Investment Discretion**

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Springboard accepts discretionary authority to manage securities accounts on behalf of clients. Springboard has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used and the commission rates paid to the custodian. Springboard does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

## **Voting Client Securities**

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Springboard does not vote proxies on securities. Clients are expected to vote their own proxies. Clients maintain responsibility to read through the information provided with the proxy voting document and make an election based on the information provided.

## **Financial Information**

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We do not require or solicit a pre-payment of fees in excess of \$1,200 per client for six months or more in advance of services rendered. Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Springboard's financial condition. Springboard has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

## **Brochure Supplement (Part 2B of Form ADV)**

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Springboard requires that advisors in its employ have a bachelor's degree and a CERTIFIED FINANCIAL PLANNER™ designation. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investments.



**Charles M. Green, CFP®, Principal**

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February 2024

**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Charles M. Green that supplements the Springboard Asset Management, LLC ("Springboard") brochure. You should have received a copy of that brochure. Please contact Charles M. Green at 203-651-7110 if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Charles M. Green is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). His individual CRD number is 2726777.

## Educational Background and Business Experience

Form ADV Part 2B, Item 2

**Charles M. Green, CFP®**

**Year of Birth** 1967

### **Formal Education after High School**

Southern Methodist University; Bachelor of Arts in Mathematics, 1991

### **Business Background for the Previous Ten Years**

Mr. Green is registered as an Investment Adviser Representative and Principal at Springboard. Prior to establishing Springboard, Mr. Green worked at the following financial institutions:

- Senior Consultant of Advisor Services / Symmetry Partners, LLC (06/2007 – 08/2010)
- Financial Advisor, New Alliance Investments, Inc. (01/2006 – 04/2007)
- Financial Consultant, Strategic Adviser, Inc/Fidelity Investments (09/1997 – 07/2003)

### **Certifications and Professional Designations**

- Mr. Green is a registered member of the National Association of Personal Financial Advisors (NAPFA).
- Certified Financial Planner® (CFP) - 1997

The **Certified Financial Planner™, CFP®** and federally registered CFP (marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by the 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 62,000 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).

**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.

**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.

Additional information regarding this designation is available by contacting the CFP Board at [www.CFP.net](http://www.CFP.net).

## Disciplinary Information

Form ADV Part 2B, Item 3

Springboard is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

### Charles M. Green

No information is applicable to this item for Mr. Green.

- A. Mr. Green has never been subject to a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the supervised person
1. was convicted of, or plead guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  3. was found to have been involved in a violation of an investment-related statute or regulation; or
  4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Green has never been subject to an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person
1. was found to have caused an investment-related business to lose its authorization to do business; or
  2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority

- a) denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business;
  - b) barring or suspending the supervised person's association with an investment-related business;
  - c) otherwise significantly limiting the supervised person's investment-related activities; or
  - d) imposing a civil money penalty of more than \$2,500 on the supervised person.
- C. Mr. Green has never been subject to a self-regulatory organization (SRO) proceeding in which the supervised person
- 1. was found to have caused an investment-related business to lose its authorization to do business; or
  - 2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.
- D. Mr. Green has never been subject to any other proceeding in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

### Other Business Activities

Form ADV Part 2B, Item 4

Mr. Green does not engage in any investment-related business activities outside of Springboard.

### Additional Compensation

Form ADV Part 2B, Item 5

Mr. Green does not receive any additional compensation such as, but not limited to, sales awards, other prizes and from any other source outside of Springboard.

### Supervision

Form ADV Part 2B, Item 6

Mr. Green is supervised by Rebecca Green, CFP®, Principal at Springboard. Ms. Green can be reached at 203-651-7110



**Rebecca D. Green, CFP®, Principal**

355 Highland Avenue, Suite 201  
Cheshire, CT 06410

203-651-7110

February 2024

**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Charles M. Green that supplements the Springboard Asset Management, LLC ("Springboard") brochure. You should have received a copy of that brochure. Please contact Charles M. Green at 203-651-7110 if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Rebecca D. Green is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Her individual CRD number is 3092319.

## Educational Background and Business Experience

Form ADV Part 2B, Item 2

**Rebecca D. Green, CFP®**

**Year of Birth** 1974

### Formal Education after High School

Eastern Connecticut State University; Bachelor of Science Business Administration

### Business Background for the Previous Ten Years

Ms. Green is registered as an Investment Adviser Representative and Principal at Springboard. Prior to establishing Springboard, Ms. Green worked at the following financial institutions:

- Financial Planner, Asset Strategies, Inc (02/2009 – 09/2011)
- Financial Advisor, Amerivest Investment Management, LLC (11/2006 – 09/2007)
- Financial Consultant, Strategic Adviser, Inc/Fidelity Investments (12/2003 – 07/2006)

### Certifications and Professional Designations

- Certified Financial Planner® (CFP) - 2007

The **Certified Financial Planner™, CFP®** and federally registered CFP (marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by the 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 62,000 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).

**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.

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.

Additional information regarding this designation is available by contacting the CFP Board at [www.CFP.net](http://www.CFP.net).

## Disciplinary Information

Form ADV Part 2B, Item 3

Springboard is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

### Rebecca D. Green

No information is applicable to this item for Ms. Green.

- E. Ms. Green has never been subject to a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the supervised person
5. was convicted of, or plead guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  6. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  7. was found to have been involved in a violation of an investment-related statute or regulation; or
  8. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.
- F. Ms. Green has never been subject to an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person
3. was found to have caused an investment-related business to lose its authorization to do business; or
  4. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
    - e) denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business;

- f) barring or suspending the supervised person's association with an investment-related business;
  - g) otherwise significantly limiting the supervised person's investment-related activities; or
  - h) imposing a civil money penalty of more than \$2,500 on the supervised person.
- G. Ms. Green has never been subject to a self-regulatory organization (SRO) proceeding in which the supervised person
  - 3. was found to have caused an investment-related business to lose its authorization to do business; or
  - 4. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.
- H. Ms. Green has never been subject to any other proceeding in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

### Other Business Activities

Form ADV Part 2B, Item 4

Ms. Green does not engage in any investment-related business activities outside of Springboard.

### Additional Compensation

Form ADV Part 2B, Item 5

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### Supervision

Form ADV Part 2B, Item 6

Ms. Green is supervised by Charles Green, CFP®, Principal at Springboard. Mr. Green can be reached at 203-651-7110