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January 24, 2024

**Form ADV Part 2A
Brochure**

This brochure provides information about the qualifications and business practices of Craig DuVarney, CFP®. If you have any questions about the contents of this brochure, please contact us at 978-772-2156 and/or planning@craigduvarney.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 Craig DuVarney, CFP® also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Craig DuVarney, CFP® is 126911.

Any references to Craig DuVarney, CFP® as a registered investment adviser or its related persons as registered Advisory Representatives does not imply a certain level of skill or training.

MATERIAL CHANGES

Item 2

At least annually, this section will discuss only specific material changes that are made to the Craig DuVarney, CFP® brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this brochure will be provided.

On January 24, 2024, we submitted our annual updating amendment for fiscal year 2023. We have updated Item 4 of our Form ADV Part 2A Brochure to disclose discretionary assets under management of approximately \$249,297,603, and non-discretionary assets under management of approximately \$15,875,107.

A copy of our updated brochure and brochure supplement is available to you free of charge and may be requested by contacting us at 978-772-2156 and/or planning@craigduvarney.com.

Additional information about Craig DuVarney, CFP® is also available via the SEC's website www.adviserinfo.sec.gov. The IARD number for Craig DuVarney, CFP® is 126911. The SEC's website also provides information about any persons affiliated with Craig DuVarney, CFP® who are registered, or are required to be registered, as Advisory Representatives of Craig DuVarney, CFP®.

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ADVISORY BUSINESS

Item 4

Craig DuVarney, CFP®, is a financial planning and investment advisory firm offering financial planning and asset management services customized to your individual needs. As well, we offer retirement consulting services to employee benefit plans and their fiduciaries.

A. Craig DuVarney, CFP® is a Sole Proprietorship that was registered with the State of Massachusetts from March 2003 through September 2017. Craig DuVarney, CFP® filed for registration with the Securities and Exchange Commission in September 2017. Craig DuVarney, CRD number 3192550, is the sole owner and Advisory Representative. Craig has been in the financial services industry since 1999. Additional business information about Craig is disclosed on the supplemental brochure attached to this brochure.

B. Craig DuVarney, CFP®, offers the following advisory services, with each service more fully described below:

- Asset Management
- Financial Planning
- Retirement Plan Consulting.

Financial Planning Services

We provide financial planning services based on your financial and tax status, age, risk tolerance and investment objectives. Depending on your needs, our advice includes topics such as:

- Tax planning analysis
- Estate planning analysis
- Business planning
- Retirement planning
- Education planning
- Budgeting and cash-flow planning
- Employee benefit analysis
- Investment analysis.

Our services may be broad or may be focused on one or more topics to address your unique situation.

The financial planning process will begin with an initial complimentary consultation to assess if we can help you with your specific needs. If you decide to engage us for services, you will be required to sign our Financial Planning Agreement outlining the relationship and specifying our fee.

Craig DuVarney will schedule a meeting with you to gather financial information and history from you about your retirement and financial goals, investment objectives, investment horizon, financial needs, cash-flow analysis, cost-of-living needs, education needs, savings tendencies, and other applicable financial information to provide the planning services you request. Craig DuVarney, CFP®, will prepare a written financial plan and present the analysis of your situation along with our recommendations for steps to be taken to assist you to work toward your financial goals.

The financial plan typically covers present and anticipated assets and liabilities, including insurance, savings, investments, and anticipated retirement or other employee benefits. The written financial plan usually includes general recommendations for a course of activity or specific actions for you to take. For example, recommendations may be made that you obtain insurance or revise existing coverage, establish an individual retirement account, increase or decrease funds held in savings accounts, or invest funds in securities. Craig DuVarney may develop tax or estate plans for clients or refer clients to an accountant or attorney.

We may also create a cash-flow analysis or work with and advise you as to the rearrangement of cash flow to fund certain long-term objectives such as buying a house, planning for college, retirement, etc.

The Financial Plan is based on your financial situation at the time and on the financial information you disclosed to Craig DuVarney. You need to be aware that certain assumptions may be made with respect to interest and inflation rates as well as the use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. Craig DuVarney, CFP®, cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. *If your financial situation or investment goals or objectives change, you must notify Craig DuVarney, CFP® promptly of the changes.* Based on your specific needs or situation, you may need to seek the services of other professionals such as an insurance adviser, attorney, and/or accountant.

You are not obligated to implement planning advice through Craig DuVarney, CFP®. If you do choose to implement the plan with Craig, he will receive commissions or other compensation in addition to the financial planning fee you paid for the planning services.

Asset Management Services

Vision2020 Wealth Management Platform – Advisor Managed Portfolios Program

The Wealth Management Platform – Advisor Managed Portfolios Program (“Advisor Managed Portfolios”) provides comprehensive investment management of your assets through the provision of execution, clearing, and custodial services through Pershing, LLC (“Pershing”).

Craig DuVarney will analyze your situation, and determine an asset allocation, based on one of 15 models, customized to your financial goals, objectives, and risk tolerance. He will then customize your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time, and your financial situation, goals, and objectives.

Craig DuVarney will schedule a meeting with you and present the recommended portfolio allocation. Upon your approval, we will implement the initial portfolio allocation. After we implement the initial portfolio allocation, with your written approval as indicated in the Investment Advisory Management Agreement, we will manage your account on a continuous and ongoing basis. In the Investment Advisory Management Agreement, you will have the opportunity to make an Investment Discretion election. If you select “Discretionary Account,” Craig DuVarney, CFP®, will

have the ability to make changes to the allocation as he deems appropriate. Craig DuVarney, CFP®, will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you. However, he typically limits the use of this discretionary authority to the annual rebalancing of client accounts. Depending on your specific goals and objectives, we will generally hold positions in your account for a long term, even more than a year.

We primarily use actively-managed, open-ended mutual funds including no-load and load-waived or mutual funds purchased at net asset value (NAV). However, managed accounts are not exclusively limited to actively-managed mutual funds and may include stocks and bonds, certificates of deposits, government securities, exchange traded funds (ETFs), index mutual funds and money markets, as appropriate.

Registered investment company securities such as mutual funds are offered in various share classes. Share classes are priced differently and have varying levels of internal costs. Share classes, other than institutional share classes, involve higher internal costs that over time will cost you more. Institutional share classes, which tend to have low annual expenses, often have higher trading costs. A client needs to consider the amount being invested and the length of anticipated holding to make a decision as to the share class most suitable to the client. Please read the disclosures under Item 10 for important information about the advice and recommendations offered by our Advisory Representatives who are also Registered Representatives. Our Advisory Representative will select the lowest cost share class funds available that are appropriate to the specific client situation. By selecting the lowest cost share class, trading costs are higher. Additionally, selecting the lowest cost share class appropriate to the situation does not mean the least expensive share class; however, it is what your Advisory Representative deems to be the lowest cost for your specific situation. Advisory Representatives consider the anticipated holding period, cost structure, and administrative and transaction costs associated with the product when selecting a share class. However, there is no way to predict the future and there are occasions where a holding is liquidated sooner or held longer than initially anticipated resulting in higher costs to the client. Additional information about share classes can be found in an Investor Alert issued by the Securities and Exchange Commission at <https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes> and <https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes>. Additionally, the SEC and FINRA provide investor information at www.sec.gov and www.finra.org.

Transactions in the account, account reallocations, and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts, and other qualified retirement accounts.

If you elect to have your accounts managed on a non-discretionary basis, no changes will be made to the allocation of your account without prior consultation with you and your expressed agreement for each transaction.

Craig DuVarney is also associated with Osaic Wealth Inc. (“Osaic Wealth”), formerly Royal Alliance Associates, Inc., as a Registered Representative. Osaic Wealth is a diversified financial services company registered with the Financial Industry Regulatory Authority (“FINRA”) as a broker-dealer engaged in the offer and sale of securities products. Craig may recommend the

purchase of securities offered by Osaic Wealth outside of the investment advisory accounts described above. Craig may receive trail compensation for investments directed through Osaic Wealth. Therefore, a conflict of interest exists between his interests and your best interests.

Craig DuVarney is also licensed as an independent insurance agent. He will earn commission-based compensation for selling insurance products, including insurance products sold to our clients. Insurance commissions earned by Mr. DuVarney are separate from and in addition to our advisory fees. The sale of insurance instruments and other commissionable products offered by Mr. DuVarney is intended to complement our advisory services. However, this practice presents a conflict of interest because a person providing investment advice on behalf of our firm who is also an insurance agent has an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. We address this conflict of interest by recommending insurance products only where we, in good faith, believe that it is appropriate for the client's particular needs and circumstances and only after a full presentation of the recommended insurance product to our client. In addition, we explain the insurance underwriting process to our clients to illustrate how the insurer also reviews the client's application and disclosures prior to the issuance of a resulting insuring agreement. Clients to whom the firm offers advisory services are informed that they are under no obligation to purchase insurance services. Clients who do choose to purchase insurance services are under no obligation to use Mr. DuVarney and may use the insurance brokerage firm and agent of their choice. Mr. DuVarney devotes a negligible amount of his professional time to insurance related activities.

Although our securities sales are reviewed for suitability by an appointed supervisor, you should be aware of the incentives we have to sell certain securities products and are encouraged to ask us about any conflict presented.

Please be aware that you are under no obligation to purchase products or services recommended by Craig DuVarney in connection with providing you with any advisory service that we offer. You have the right to decide whether or not to implement our advice and the right to consult with other financial professionals for implementation.

Accounts may not be established by the deposit of securities or the depositing of additional securities into existing fee based brokerage accounts, which were purchased by you on a commission basis in the prior 24 months through Osaic Wealth. The purpose of this prohibition is to prevent you from paying arguably duplicative or extra charges. You are advised that you may also not want to open fee-based brokerage accounts with the proceeds from the sale of commission trades because you will then bear the transaction fees on purchases and sales of the commission trades and the fees and charges associated with the fee-based brokerage account.

C. We tailor the advisory services we offer to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities. We will ask you to complete a 9-page Personal Information Form to assist us with obtaining information about your financial situation and history. Additionally, we will meet with you and conduct an interview and data-gathering session to continue the due-diligence process. The information gathered by Craig DuVarney, CFP®, will assist the firm in providing you with the requested services and customize the

services to your financial situation. Depending on the services you have requested, we will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Existing portfolio statements, including retirement account information
- Financial needs
- Tax bracket information
- Cash-flow analysis
- Cost-of-living needs
- Savings tendencies
- Other applicable financial information required by our Advisory Representative to provide the investment advisory services you have requested.

We use the software, NaviPlan Standard, for all clients to prepare written plans and run analysis on retirement and college funding goals.

With most clients, there will be more than one meeting with possibly as many as four to five meetings, depending on the scope of the engagement and the number of iterations of a plan. Generally, all recommendations will be made and discussed with you during our meetings.

D. Craig DuVarney, CFP®, does not participate in any wrap-fee programs.

E. Craig DuVarney, CFP®, provides asset management services on a continuous and ongoing basis. As of December 31, 2023, we had \$249,297,603 of client assets under our discretionary management and \$15,875,107 of non-discretionary client assets under our management services.

IRA Rollover Considerations

As part of our consulting and advisory services, we provide you with recommendations and advice concerning your employer retirement plan or other qualified retirement account. When appropriate, we recommend that you withdraw the assets from your employer's retirement plan or other qualified retirement account and roll the assets over to an individual retirement account ("IRA") that we will manage. If you elect to roll the assets to an IRA under our management, we will charge you an asset-based fee as described in Item 5. This practice presents a conflict of interest because our investment advisory representatives have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if you do complete the rollover, you are under no obligation to have your IRA assets managed by us. You have the right to decide whether or not to complete the rollover and the right to consult with other financial professionals.

Some employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent

the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:

1. Leave the funds in your employer's (former employer's) plan.
2. Roll over the funds to a new employer's retirement plan.
3. Cash out and take a taxable distribution from the plan.
4. Roll the funds into an IRA rollover account.

Each of these options has advantages and disadvantages. Before making a change, we encourage you to speak with your financial advisor, CPA, and/or tax attorney.

Before rolling over your retirement funds to an IRA for us to manage, carefully consider the following. NOTE: This list is not exhaustive.

1. Determine whether the investment options in your employer's retirement plan address your needs or whether other types of investments are needed.
 - a. Employer retirement plans generally have a more limited investment menu than IRAs.
 - b. Employer retirement plans may have unique investment options not available to the public, such as employer securities or previously closed funds.
2. Your current plan may have lower fees than our fees.
 - a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 - b. You should understand the various products and services available through an IRA provider and their costs.
 - c. It is likely you will not be charged a management fee and will not receive ongoing asset management services unless you elect to have such services. If your plan offers management services, the fee associated with the service may be more or less than our asset management fee.
3. Our strategy may have higher risk than the options provided to you in your plan.
4. Your current plan may offer financial advice, guidance, management, and/or portfolio options at no additional cost.
5. If you keep your assets titled in a 401(k) or retirement account, you could potentially delay your required minimum distribution beyond age 70.5 (70½).
6. Your 401(k) may offer more liability protection than a rollover IRA; each state may vary. Generally, Federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies; however, there can be exceptions. Consult an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401(k), but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses, or a home purchase.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan

name.

It is important that you understand your options, their features and their differences, and decide whether a rollover is best for you. If you have questions, contact us at our main number listed on the cover page of this brochure.

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also 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. We have to act in your best interests and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests.

Retirement Plan Consulting Services

We offer retirement consulting services to employee benefit plans and their fiduciaries. The services are designed to assist the plan sponsor (the “Company”) in meeting its management and fiduciary obligations to the plan under ERISA. Retirement consulting services will consist of general or specific advice, and include any one or all of the following:

1. Platform Provider Search and Plan Set-up
2. Strategic Planning and Investment Policy Development/Review
3. Plan Review
4. Plan Fee and Cost Review
5. Acting as Third-Party Service Provider Liaison
6. Assessment of Plan Investments and Investment Options
7. Plan Participant Education and Communication
8. Investment Advice to Participant
9. Plan Benchmarking
10. Plan Conversion to New Vendor Platform
11. Assistance in Plan Merger
12. Legislative and Regulatory Updates; Plan Corrections.

The Company may also engage us to provide a review of executive benefits, for separate compensation.

We will determine with the Company in advance the scope of services to be performed and the fees for all requested services. Prior to engaging us to provide pension consulting services, the Company will be required to enter into a written agreement with us setting forth the terms and conditions of the engagement, describing the scope of the services to be provided, and the relevant fees and fee paying arrangements. The services outlined above that we provide are explained in more detail in the written agreement. We will also provide additional disclosures about our services and fees, where required by ERISA.

When we perform our agreed-upon services, we will not be required to verify the accuracy or consistency of any information received from the Company.

We will serve in a non-discretionary ERISA fiduciary capacity with respect to some, but not all, of the services that we provide, which will be further explained in the written agreement we sign with the Company. The Company is always free to seek independent advice about the appropriateness of any recommendations made by us.

General Information

The investment recommendations and advice offered by Craig DuVarney, CFP®, are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. Our primary goal is to help our clients identify and pursue their financial goals, thereby enhancing the overall quality of their lives.

FEES AND COMPENSATION**Item 5****Asset Management Services**

A. Our fees are negotiable and are not based on a share of capital gains or capital appreciation of the funds or any portion of the funds in your account.

Fee Schedule

Account Size	Maximum Annual Fee
\$0 to \$499,999	2.00%
\$500,000 to \$599,999	1.70%
\$600,000 to \$699,999	1.42%
\$700,000 to \$799,999	1.22%
\$800,000 to \$899,999	1.07%
\$900,000 to \$999,999	0.95%
\$1,000,000 to \$1,250,000	0.85%
\$1,250,000 to \$1,499,999	0.68%
\$1,500,000 to \$1,749,999	0.57%
\$1,750,000+	0.50%

We offer Advisor Managed Portfolios with separate advisory fees and transaction charges. As such, in addition to the quarterly account fee described below for advisory services, you will also pay separate per-trade transaction charges.

You will pay a quarterly account fee, in advance, based on the market value of the assets held in your account as of the last business day of the preceding calendar quarter. Your account fees are negotiable and will be debited from your account by our custodian. If you terminate your account, the account fee will be credited to you on a pro rata basis for the unused portion of the quarter.

If you have more than one investment advisory account covered under the Investment Advisory Management Agreement at Craig DuVarney, CFP®, we will aggregate the values of your portfolios for the purposes of computing our management fee.

You may make additions to the account or withdrawals from the account, provided the account continues to meet minimum account size requirements. Additional assets deposited into the account after it is opened will be charged a pro rata fee based on the number of days remaining in the then current 3-month period. Additionally, partial withdrawals from the account will result in a prorated portion of the fee being credited to your account. No fee adjustments will be made for account appreciation or depreciation.

B. If the account is established or closed during the middle of a quarter, you will pay a prorated portion of the advisory fee based on the number of days the account was under Craig DuVarney, CFP®'s management. You will authorize us in the Investment Advisory Management Agreement to instruct the custodian to deduct the advisory fee directly from your account. Pershing will provide you with a quarterly statement that lists the total fees deducted from the account as well as all transactions that were conducted in the account that quarter.

C. In addition to the advisory fees above, you will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. You will also pay fees for custodial services, account maintenance fees, and other fees associated with maintaining the account. These fees are not charged by Craig DuVarney, CFP®, and are charged by the product, broker-dealer, or account custodian. Craig DuVarney, CFP®, does not share in any portion of these fees. Additionally, you will pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. These advisory fees are not shared with Craig DuVarney, CFP® and are compensation to the fund manager. More information is available in the mutual fund prospectus.

In addition to the per-trade transaction charges referenced above, you will also be subject to per-trade confirmation fees as disclosed on your trade confirmation and an additional fee for each trade confirmation that you do not elect to receive electronically. You will also be subject to an additional, per-trade transaction charge on the selling of certain securities as disclosed on your trade confirmation. These fees are not shared with us but are transaction charges paid to Osaic Wealth and our custodian. Please see Item 10, which explains our relationship with Osaic Wealth.

There are additional fees relating to IRA and Qualified Retirement Plan accounts that you will incur such as maintenance and termination fees. You will find these fees disclosed in the account application paperwork provided to you associated with these accounts.

D. The advisory fee is billed quarterly in advance. Fees will be based on the value of the account on the last business day of the preceding calendar quarter. If your account does not contain sufficient funds to pay the advisory fees, we have the limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. Except for ERISA and IRA accounts, you may reimburse your account for advisory fees paid to Craig DuVarney, CFP®.

Fee calculation example for a \$350,000 account during 2nd quarter (April, May, and June):

➤ $\$350,000 \times 2.00\% = \$7,000$ divided by $365 \times 91 =$ **\$1,745.21 Quarterly Fee**

Craig DuVarney, CFP®, may change the above fee schedule upon a 30-day prior written notice to you.

E. As previously indicated, Craig DuVarney is separately Registered Representative of Osaic Wealth, a registered Broker-Dealer, member of the Financial Regulatory Association (FINRA) and SIPC. Craig DuVarney, as a Registered Representative, may receive trail commissions (i.e., 12b-1 fees) for a period of time as a result of directing securities transactions through Osaic Wealth. Load and no-load mutual funds pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. 12b-1 fees are initially paid to Osaic Wealth and a portion passed to the Advisory Representative. The receipt of these fees represent an incentive for Craig DuVarney to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a conflict of interest. Advisory fees will not be offset by any 12b-1 fees received by Craig DuVarney, except for qualified ERISA plans.

Although Craig DuVarney may receive 12b-1 fees in commission-based accounts, he does not receive such fees in advisory accounts. In those accounts, the 12b-1 fee is credited to the client's account.

As stated above, Craig DuVarney, CFP®, recommends mutual funds that pay 12b-1 fees and no-load funds. You are able to purchase the securities recommended by Craig DuVarney, CFP®, directly or through other brokers or agents not affiliated with Craig DuVarney, CFP®.

Although he no longer actively recommends variable annuity products, Craig DuVarney receives 12b-1 fees from variable annuities that he sold to clients in the past or on variable annuities on which he has become the broker of record. The following provides important information about the cost structure of variable annuity products. Variable annuity products have additional costs to the client. These costs include surrender fees if the purchase of the product results from the transfer from another variable product; costs associated with living or death benefits; administrative fees; sub-account management fees; mortality and expense fees; and bonus expenses if the product has a bonus element. Certain variable annuities have surrender fees if the annuity is transferred or liquidated within the stated surrender period. Surrender periods can range from 5 to 10 years depending on the individual product purchased. Additionally, certain variable products often have limitations on the number of transactions that can be conducted among the subaccounts. Exceeding the limitation could result in additional expenses. Please read the variable annuity prospectus for details on the costs associated with the product.

Negotiability of Fees

We allow Associated Persons servicing the account to negotiate the exact investment management fees within the range disclosed in our Form ADV Part 2A Brochure. As a result, the Associated Person servicing your account may charge more or less for the same service than another Associated Person of our firm. Further, our annual investment management fee may be higher than that charged by other investment advisors offering similar services/programs.

Billing on Cash Positions

The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

Periods of Portfolio Inactivity

The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and

other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

Termination Provisions

You may terminate investment advisory services obtained from Craig DuVarney, CFP®, without penalty, upon verbal or written notice within 5 business days after entering into the advisory agreement with Craig DuVarney, CFP®. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, you may terminate investment advisory services upon written notice to Craig DuVarney, CFP®. You will receive, if applicable, a prorated refund of any prepaid advisory fees. The prorated refund will be based on actual services and termination costs incurred up to and at the time of termination of our services.

Financial Planning Services

Fees for financial planning services are strictly for financial planning services. Therefore, you will pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Financial planning fees are negotiated at our discretion and typically range from \$3,500–\$5,000. Your specific fee will be stated in your agreement. Your fees will be dependent on several factors including time spent with Craig DuVarney, CFP®, number of meetings, complexity of your situation, amount of research, services requested, and/or staff resources. Fifty percent (50%) of the estimated fee is due when you sign our Financial Planning Agreement, with the balance due upon our presentation of the plan to you. Typically the financial plan will be presented within 90 days of the contract date, provided that you have promptly provided all information needed to prepare the financial plan.

Termination Provisions

You may terminate financial planning services obtained from Craig DuVarney, CFP®, without penalty, with verbal or written notice within 5 business days after entering into the advisory agreement with Craig DuVarney, CFP®. Thereafter, you may terminate planning services with written notice to Craig DuVarney, CFP®. You will be responsible for any time spent by Craig. Any unearned, pre-paid fees will be refunded. Refunds will not be provided for work that has already been performed.

Retirement Plan Consulting Services

Generally, our advisory fee will be offset by commissions, including 12b-1 fees of 50 to 75 basis points, in the manner and amount described in the executed written agreement and accompanying disclosure documents provided by the Client's third party retirement plan platform. Alternatively, the 12b-1 fees otherwise payable to Craig DuVarney, CFP will be deposited into a Plan Expense Account, and then paid out to Craig DuVarney, CFP in the form of an investment advisory fee.

The written agreement may be terminated by us or the Company at any time upon a 30-day prior written notice. Upon termination, we will deliver a final billing statement for unbilled work performed prior to termination, and the Company will have a period of 30 days within which to deliver payment. If agreement termination occurs, our fee will be credited to the company on a pro-rata basis for the unused portion of the billing period. When we calculate the credit, we will subtract any unbilled work we performed for the Company prior to termination.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT Item 6

Craig DuVarney, CFP® does not charge performance-based fees and therefore does not engage in side-by-side management.

TYPES OF CLIENTS Item 7

Craig DuVarney, CFP®'s services are geared toward individuals and families including both high-net-worth and non-high-net worth individuals.

The minimum investment required under our Asset Management Program is generally \$1,000,000 for Advisor Managed Portfolios accounts. Accounts below this minimum may be accepted on an individual basis at our discretion. Such circumstances may include, but not be limited to, those situations where additional assets will soon be deposited, or where the client has other commission-based assets with Craig DuVarney. Existing clients are required to maintain a minimum of \$750,000 in assets under management with us. In our sole discretion, we may waive this requirement. The minimum requirement is based upon the aggregate value of investment advisory accounts in the household. You should be aware that performance may suffer due to difficulties with diversifying smaller accounts and that a lack of diversification can lead to greater portfolio risk. Performance of smaller accounts may vary from the performance of accounts with more dollars invested because fluctuations in the market may affect smaller accounts more.

METHODS of ANALYSIS, INVESTMENT STRATEGIES and RISK of LOSS Item 8

A. Craig DuVarney, CFP®, conducts economic analysis and attempts to analyze and determine economic trends. Additionally, Craig DuVarney, CFP®, conducts fundamental analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure.

B. Investing in securities involves risk of loss, including the potential loss of the principal money you are investing. Therefore, your participation in the management program offered by Craig DuVarney, CFP®, requires you to be prepared to bear the risk of loss as well as the fluctuating performance of your accounts. Market values of investments will always fluctuate based on market conditions.

We do not represent, warrant, or imply that the services or methods of analysis we use can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Craig DuVarney, CFP®, will provide a better return than other investment strategies.

The primary risk factors applicable to our investment program generally include:

- **Market risk**—The price of a security, bond, mutual fund and/or exchange-traded 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 circumstances. For example, economic, political and social conditions may trigger market-related events.
- **Interest rate risk**—The chance that investment prices will change based on a move in interest rates (bond prices decline as interest rates rise). Relative to fixed income securities with near-term maturities, longer maturity bonds will have a larger change in price with a move in interest rates.
- **Inflation risk**—The risk that investment returns will be below the general increase in prices due to inflation.
- **Category or style risk**—The chance that one investment category or style may underperform or outperform other categories and styles.
- **Credit risk**—The chance that a bond issuer will fail to pay interest and principal in a timely manner.
- **Reinvestment risk**—The potential exposure 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.
- **Early redemption risk**—Some bonds have features that allow the bond issuer to repurchase or redeem the bond before maturity at a specific price. This risk is the chance that the borrower will do so; thus, expose the investor to a lower than expected return on that bond investment.
- **Systematic risk**—Also known as "market risk," this is the chance of a severe drop of an entire financial market (e.g., political or social upheaval, natural disaster, etc.).
- **Unsystematic risk**—Also known as "specific risk," this is the chance of a decline in the value of a particular asset (i.e., an individual stock declines while the overall stock market is not impacted).
- **Currency risk**—Also known as "exchange rate risk," this is the chance that foreign investments will be subject to fluctuations in the value of the dollar against the currency of the investment's country of origin.
- **Tax risk**—This is the chance that the taxing authority changes its tax rates or policies (e.g., rescind tax-exempt status of particular bonds).

- **Liquidity risk**—This is the risk whereby the ability to buy or sell a security becomes more difficult and, therefore, negatively impacts the price at which one is able to transact in the security.
- **Financial risk**—Excessive borrowing to finance the ongoing operations of a business 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 declining market value.
- **Sector risk**—This is the chance that major problems may impact a specific sector, or that returns from that sector may trail the returns of the overall equity market. Daily fluctuations in individual sectors can often be more extreme than fluctuations in the overall market.
- **Price volatility**—The price of a security, mutual fund and/or exchange-traded fund may fluctuate, even significantly, in a short period of time.
- **Exchange-traded fund pricing risk**—Exchange-traded fund shares may trade in the market at a premium or discount to their net asset (NAV) because of market supply and demand. The premiums and discounts for specific exchange-traded funds can vary, depending on the type of exchange-traded fund and time period.

C. As stated above in Item 5, Craig DuVarney, CFP®, will primarily use actively managed mutual funds in client portfolios. The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers, and/or the fund straying from its stated investment objective. Open-ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day. Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's website. At the client's request, Craig will direct the client to the appropriate webpage to access the prospectus.

The risks with ETFs include the fact that actively traded ETFs can create increased trading expenses and fees and the intraday trading opportunities created by ETFs may not fit into a long-term investor's strategy. In addition, an ETF more heavily weighted towards a particular market sector may be more volatile over short and long periods of time than a more broadly diversified ETF.

DISCIPLINARY INFORMATION

Item 9

There is no reportable disciplinary information required for Craig DuVarney, CFP®, or its management persons that is material to your evaluation of us, our business or our management persons.

OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS

Item 10

A. , B. Craig DuVarney, CFP®, does not have a related person who is a broker-dealer or other similar type of broker or dealer, investment company or other pooled investment vehicle, other

investment adviser or financial planner, futures commission merchant or commodity pool operator, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer, or sponsor or syndicator of a limited partnership.

As previously stated in Item 5E, Craig DuVarney is separately registered as an Advisory Representative of Craig DuVarney, CFP®, and as a Registered Representative of Osaic Wealth. You are under no obligation to purchase or sell securities through Craig DuVarney. However, if we developed a financial or retirement plan for you and you choose to implement the plan with our assistance in our role as a Registered Representative and/or insurance agent, commissions will be earned in addition to any fees you paid for the other advisory services. Commissions may be higher or lower at Osaic Wealth than at other broker-dealers. Craig DuVarney who is a Registered Representative and an insurance agent has a conflict of interest in having you purchase securities and/or insurance-related products through Osaic Wealth in that the higher his production with Osaic Wealth, the greater potential for obtaining a higher pay-out on commissions and fees earned. NOTE: No commissions will be charged on assets under our Asset Management Services.

Osaic Wealth collects a percentage of advisory fees generated by Craig DuVarney, CFP® for supervisory and other support services. Raymond Jacques, a registered representative of Osaic Wealth, serves in the capacity of Office of Supervisory Jurisdiction to Mr. DuVarney. Mr. Jacques has discretion in determining the percentage of advisory fees collected by Osaic Wealth for supervisory and other support services.

Raymond Jacques is also the principal owner of New England Schooner, Inc., a registered investment adviser. We have entered into a solicitor's agreement with New England Schooner, Inc., whereby we refers clients with portfolios below our required asset minimum to New England Schooner, Inc. and we receive 49% of the advisory fee paid by the referred client for the proceeding 5 years. The dual business relationship with Mr. Jacques and the referral arrangement with New England Schooner, Inc. create a conflict of interest in that Mr. Jacques has an incentive to reduce the amount of fees collected by Osaic Wealth in return for more client referrals from Craig DuVarney, CFP® to New England Schooner, Inc.

Craig DuVarney, CFP® upholds his fiduciary duty by disclosing this conflict and by recommending investment advisers that in Mr. DuVarney's belief act in the best interest of clients. We inform you that you are not obligated to accept our recommendations and you are free to consult other financial professionals. We are bound by our Code of Ethics to act in an ethical manner.

It is important to understand investment advisers have a fiduciary obligation to provide advice and services through the investment adviser that are in the best interest of the client. However, when Advisory Representatives act in the capacity of a Registered Representative, their regulatory obligation is to make recommendations and conduct transactions that are suitable to you but are not necessarily in your best interest.

Under the rules and regulations of the FINRA, Osaic Wealth has an obligation to perform supervisory functions regarding certain activities engaged in by Advisory Representatives who are also Registered Representatives of Osaic Wealth. For such supervisory functions, Craig DuVarney,

CFP® pays Osaic Wealth a portion of the advisory fees they receive. Osaic Wealth and Craig DuVarney, CFP®, are not affiliated.

Craig is licensed with various insurance companies. Commissions will be earned if you purchase insurance products through him. You are under no obligation to purchase insurance products or services through your Craig DuVarney. Although insurance business typically only represents 3% of the gross revenue to Craig DuVarney, because of the conflict of interest in having you purchase insurance products through him, this disclosure is provided to you. Clients have the right to decide whether or not to purchase insurance products and which insurance professionals to use.

Craig DuVarney, CFP® attempts to mitigate the conflicts of interest relating to the receipt of commissions by providing you with these disclosures. You have the right to decide whether or not to engage services and purchase products and which professionals to use. You are free to consult with other professionals regarding the implementation of your financial or retirement plan if you so choose. Furthermore, as a Registered Representative with Osaic Wealth, Craig is subject to a supervisory structure at Osaic Wealth for all securities business.

Craig DuVarney, CFP®, is not actively engaged in any other financial industry entity.

D. Craig DuVarney, CFP®, does not recommend the services of a Third-Party Manager.

CODE of ETHICS, PARTICIPATION or INTEREST in CLIENT TRANSACTIONS and PERSONAL TRADING

Item 11

Code of Ethics

A. Craig DuVarney, CFP®, has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. Craig DuVarney, CFP®, takes seriously these compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as our policies and procedures. Further, we strive to handle your non-public information in such a way to protect information from falling into the hands of anyone who has no business reason to know such information. We provide you with our Privacy Policy that details our procedures for handling your personal information. Craig DuVarney, CFP®, maintains a Code of Ethics for supervised persons and office staff. The Code of Ethics contains provisions for standards of business conduct to comply with Federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, our Code of Ethics establishes our firm's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

B. Neither Craig DuVarney, CFP®, nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.

C. Craig DuVarney, CFP®, and our associated persons may buy or sell securities identical to those securities recommended to you. Therefore, Craig DuVarney, CFP®, and/or our associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. We will not put our interests before your interest. Neither Craig DuVarney, CFP®, nor any associated person may trade ahead of you or trade in such a way to obtain a better price for

themselves than for you or other clients. No affiliated person may trade in a client's account in such a way as to disadvantage any client.

D. Craig DuVarney, CFP®, is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline to implement any investment recommendation. Craig DuVarney, CFP®, and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

BROKERAGE PRACTICES

Item 12

A. As previously stated, Advisory Representatives are Registered Representatives of Osaic Wealth. As a result they are subject to FINRA Conduct Rule 3040, which restricts them from conducting securities transactions away from Osaic Wealth unless Osaic Wealth provides them with written authorization.

You are advised that not all investment advisers require you to maintain accounts at a specific broker-dealer. You are advised you may maintain accounts at another broker-dealer. However, the services provided by Craig DuVarney, CFP®, will be limited to only advice and will not include implementation. If you select another brokerage firm for custodial and/or brokerage services, you will not be able to receive asset management services from Craig DuVarney, CFP®.

In initially selecting Osaic Wealth, Craig DuVarney, CFP®, conducted due diligence. Our evaluation and criteria included ability to service you, staying power as a company, industry reputation, ability to report to you and to us, trading platform, products and services available, technology resources, and educational resources.

Periodically, we will review alternative broker-dealers and custodians in the marketplace to ensure Osaic Wealth and its custodians are meeting our duty to provide best execution for your accounts. The review will include a comparison to Osaic Wealth that involves evaluating criteria such as overall expertise, cost competitiveness, and financial condition. The quality of execution by Osaic Wealth will be reviewed through trade journal evaluations. However, best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently used custodian.

Additionally, some product sponsors such as variable and investment companies and limited partnerships that are recommended to you provide support to Craig DuVarney, CFP®. Such support includes research, educational information, and monetary support for due-diligence trips and client events. We receive a benefit because we do not have to pay for the research, products, or services.

You are advised there is an incentive for Craig DuVarney, CFP®, to recommend Osaic Wealth over other broker-dealers based on the products and services that we will receive.

Osaic Wealth has a wide range of approved securities products for which Osaic Wealth performs due diligence prior to selection. As Osaic Wealth Registered Representatives, we are required to adhere to these products when implementing securities transactions through Osaic Wealth. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker-dealer. Osaic Wealth also provides Craig DuVarney, CFP®, with back-office operational, technology, and other administrative support. Other services may include consulting, publications, and conferences on practice management, information technology, business succession planning, regulatory compliance, and marketing. Such services are intended to help us manage and further develop its business enterprise.

Osaic Wealth and its clearing broker-dealer, Pershing, LLC, also make available to Craig DuVarney, CFP®, other products and services that benefit Craig DuVarney, CFP®, but do not directly benefit you. Some of these other products and services assist Craig DuVarney, CFP®, with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information, and other market data; facilitate payment of Craig DuVarney, CFP®'s fees from your accounts; and assist with back-office functions; recordkeeping; and client reporting. Many of these services generally may be used to service all or a substantial number of our accounts.

Craig DuVarney, as a Osaic Wealth Registered Representative, receives trail commissions (i.e., 12b-1 fees) in commission-based accounts only for a period of time as a result of directing securities transactions through Osaic Wealth. Load and no-load mutual funds pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. 12b-1 fees are initially paid to Osaic Wealth and a portion passed to Craig DuVarney. The receipt of such fees in commission-based accounts represent an incentive for Craig to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a conflict of interest.

B. Due to the individual management of client accounts, we do not aggregate the purchase or sale of securities for various client accounts.

REVIEW of ACCOUNTS

Item 13

A. Your managed account will be reviewed at least quarterly. You may request more frequent reviews and set thresholds for triggering events that would cause a review to take place. You will be contacted at least annually to review your financial status, goals and objectives. You must notify Craig DuVarney promptly of any changes to your financial goals, objectives, or financial situation as such changes may require him to review the portfolio allocation and make recommendations for changes. All reviews are conducted by Craig DuVarney.

B. Craig DuVarney will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

C. You will be provided statements at least quarterly directly from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian.

If you are participating in Financial Planning Services only, you will not receive regular reviews. Craig DuVarney, CFP®, recommends you have at least an annual review and update to any plans. However, the time and frequency of the reviews is solely your decision. Other than the initial plan or analysis, there will be no other reports issued.

CLIENT REFERRALS and OTHER COMPENSATION

Item 14

A. Some product vendors recommended by Craig DuVarney, CFP®, provide monetary and non-monetary assistance with client events and provide educational tools and resources. We do not select products as a result of any monetary or non-monetary assistance. The selection of product that is most appropriate for the client is first and foremost. Craig DuVarney, CFP®'s due diligence of a product does not take into consideration any assistance it receives. Although the receipt of products or services is a benefit for you and us, it also presents a conflict of interest.

As described in Item 12 above, we receive economic benefits from our custodial broker dealer in the form of support products and services they make available to us and other independent investment advisors whose clients maintain their accounts at these custodial broker dealers. The availability of custodial products and services is not dependent upon or based on the specific investment advice we provide our clients, such as buying or selling specific securities or specific types of securities for our clients. The products and services provided by the custodial broker dealer, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices).

As discussed previously, our Advisory Representative is a Registered Representative of Osaic Wealth Inc. This affiliation requires us to only offer you services and programs sponsored or approved by Osaic Wealth. Osaic Wealth offers our Advisory Representative educational, training, and other programs if he meets certain sales production goals. This may include the payment or reimbursement of travel, meals, and lodging expenses for attendees. Payment/reimbursement of expenses is not contingent upon sales targets or contests, but rather on the total amount of production. This additional compensation presents a conflict of interest because Craig DuVarney, CFP® has a greater incentive to make available, recommend, or make investment decisions regarding investments for your account that enable our Advisory Representative to meet the production goals noted above. Further information regarding fees and charges assessed to you by investment products you purchase is available in the appropriate product prospectus, statement of additional information, and/or offering document.

Osaic Wealth provided a \$95,000 five-year forgivable loan for September 2019 through September 2024 as an incentive for Craig DuVarney, CFP®, to remain with Osaic Wealth during the buy-out by Reverence Capital Partners.

If you have any concerns about the appropriateness of the recommendation provided by your Advisory Representative, you should discuss this with your Advisory Representative. As well, you are free to consult other financial professionals.

Although our securities sales are reviewed for suitability by an appointed supervisor, you should be aware of the incentives we have to sell certain securities products and are encouraged to ask us about any conflict presented.

B. Craig DuVarney, CFP®, does not directly or indirectly compensate any person or entity that is not a supervised person of our firm for client referrals.

However, Craig DuVarney, CFP®, receives compensation for referring clients with portfolios valued below the current asset minimum to New England Schooner, Inc. Detailed information about this relationship and the related conflicts are described in detail in Item 10 above.

CUSTODY

Item 15

Craig DuVarney, CFP®, does not have physical custody of any client funds or securities. However, under government regulations, we are deemed to have constructive custody of your assets if you:

1. Authorize us to instruct Osaic Wealth to deduct our advisory fees directly from your account. Your custodian, Pershing, LLC, maintains the actual custody of your assets. You will receive account statements directly from Pershing, LLC at least quarterly. They will be sent to the email or postal mailing address you provided to them. You should review the statements carefully and promptly when you receive them. Please see Item 5 for more information regarding the deduction of advisory fees from client accounts.
2. Set up certain 1st party wire disbursements and/or 3rd Party Standing Letters of Authorization (SLOAs) to direct us to transfer funds or securities from your account to a specified party.

INVESTMENT DISCRETION

Item 16

You may grant Craig DuVarney, CFP®, authorization to manage your account on a discretionary basis. You will grant such authority to Craig DuVarney, CFP®, by execution of the Investment Advisory Management Agreement. You may terminate the discretionary authorization at any time by giving us written notice.

Additionally, you are advised that:

1. You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations.
2. Your written consent is required to establish any mutual fund, variable annuity, or brokerage account.
3. If you elect to implement recommendations through Craig DuVarney, we require the use of Osaic Wealth, the broker-dealer with which Craig DuVarney is registered for sales in commissionable mutual funds or variable annuities.

VOTING CLIENT SECURITIES

Item 17

Craig DuVarney, CFP®, does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact Craig DuVarney about questions you may have and opinions on how to vote the proxies. However, the decision to vote and how you vote the proxies is solely up to you.

FINANCIAL INFORMATION

Item 18

- A. Craig DuVarney, CFP®, will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service; therefore, a balance sheet is not required to be attached.
- B. Craig DuVarney, CFP®, is financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.
- C. Craig DuVarney, CFP®, has never been the subject of a bankruptcy petition.

REQUIREMENTS for STATE-REGISTERED ADVISERS

Item 19

This section is not applicable as Craig DuVarney, CFP®, is registered with the Securities and Exchange Commission.