

Wealth Advisory Solutions, LLC

**8910 Purdue Road Suite 240
Indianapolis, IN 46268**

Firm Brochure for

Cedar Wealth Partners

CRD Number: 288903

Dated March 28th 2020

Telephone: 317-559-2940

This brochure provides information about the qualifications and business practices of Wealth Adviser Solutions ("Adviser") doing business as Cedar Wealth Partners, LLC. If you have any questions about the contents of this brochure, please contact us by telephone at: 513-562-1675, or by email at: mswendiman@keybridgecompliance.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. The Adviser's registration as an Investment Adviser does not imply a certain level of skill or training.

Additional information about the Adviser is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

Annual Update

The Firm Brochure will be updated annually or when material changes occur since the last update.

Material Changes since the Last Update

There are no material changes to report.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact Matt Swendiman by telephone at: 513-562-1675, or by e-mail at: mswendiman@keybridgecompliance.com.

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Item 4: Advisory Business

Firm Description

Wealth Advisory Solutions (“WAS”) is an Indiana limited liability company formed on May 25, 2017. The Adviser is an investment adviser registered with the Securities and Exchange Commission (“SEC”) under the Investment Advisers Act of 1940, as amended (the “Investment Advisers Act”). The principal owners of WAS are Steve Kyburz, Ty Needler, and Kim Custer. The primary types of investment advisory services offered by the Adviser are investment management and financial planning.

In addition, WAS is also doing business as Cedar Wealth Partners (“Cedar Wealth Partners”). Cedar Wealth Partners is operated by David Hobbs, Rick Davis and Jeff Spencer and owned by David Hobbs, Steve Kyburz, Ty Needler, and Kim Custer. Cedar Wealth Partners has two office locations within Indiana. David Hobbs and Rick Davis operate from 8910 Purdue Road Suite 240, Indianapolis, IN 46068. Jeff Spencer conducts business from 1340 Ohio Street, Terre Haute, IN 47807. Cedar Wealth Partners provides the same investment advisory services as WAS.

Investment Management

Investment advisory services offered by Cedar Wealth Partners are specifically tailored to meet the needs of each client. Prior to delivering investment advisory services, the Adviser will ascertain each client’s specific investment objective. Then Cedar Wealth Partners will allocate, or recommend that the client allocate, their investment assets consistent with the designated investment objective. Clients may impose reasonable restrictions on any of the Adviser’s investment advisory services at any time, but restrictions must be delivered to the Adviser.

Cedar Wealth Partners also works with Clients to implement an investment program in which Client accounts are sub-managed by independent third party money managers. More specifically, Cedar Wealth Partners may assist Clients in determining the appropriate allocation of the Clients’ invested assets among different asset classes by utilizing a third-party money manager who specializes in each of those asset classes. The third-party managers would be responsible for continuously monitoring the Client account and making trades when necessary.

Discretionary Management

In addition, the Adviser can provide discretionary trading authority over the assets dedicated to the client’s recommended investment strategy, which can include initial allocation and ongoing rebalancing utilizing the research and model portfolios from 3rd party investment manager). The discretionary

authority allows Cedar Wealth Partners to buy, sell or otherwise trade the assets in the client's account without prior approval of each transaction.

Non- Discretionary Management

In addition to providing investment management of client assets on a discretionary basis, the Adviser, for a separate and additional fee, provides certain limited services to clients with respect to "Managed Non-Discretionary Assets." These services consist solely of the following:

The Advisor is available to consult with the client on a semi-annual basis (or more often if requested by the client) regarding the Managed Non-Discretionary Assets. However, the client is solely responsible for all decisions and consequences on the client's Managed Non-Discretionary Assets, including decisions on whether to retain or sell all or a portion of the Managed Non-Discretionary Assets. This responsibility remains solely with the client regardless of whether any security is reflected on account reports prepared by the Adviser.

The Advisor is available to service Managed Non-Discretionary Assets, such as setting up and monitoring regular distributions and special one-time distribution requests.

The Adviser can process any trades on the Managed Non-Discretionary Assets, but only when requested to do so by the client in writing. Upon receipt of any client's written request, The Advisor will endeavor, but cannot guarantee, that any such transaction will be effected on the day received or at any specific time or price.

Limitations for Non-Discretionary Assets

Clients that engage the Adviser on a non-discretionary investment advisory basis must be willing to accept that The Advisor cannot effect any account transactions without obtaining prior written consent to any such transaction(s) from the client. Thus, in the event of a market correction during which the client is unavailable, The Advisor will be unable to effect any account transactions (as it would for its discretionary accounts) without first obtaining the client's written consent.

Financial Planning

Cedar Wealth Partners offers financial planning services to Investment Management Clients at no additional cost. Cedar Wealth Partners begins with an intensive fact-finding session which helps the Adviser become totally familiar with the client's current financial situation (including among other things, income taxes, investments, insurance, estate affairs and family circumstances), as well as their personal goals and priorities for the next several years. Then, working from this comprehensive information, the Adviser prepares a detailed financial plan which documents the client's situation, identifies all areas which will be impacted, and makes specific goal-oriented recommendations. The Adviser's specific goal-oriented recommendations are designed to educate and allow a client to coordinate his/her financial affairs more efficiently, increase cash flow, prudently reduce income taxes, and attempt to improve his/her overall net worth. Once this written document has been discussed with the client, the recommendations that the client feels comfortable with are scheduled for implementation with specific deadlines to be met. Cedar Wealth Partners continues to assist the client based on an annual review of services in all applicable areas of financial planning including estate, retirement, cash flow and tax planning.

For clients interested only in financial planning and do not have assets invested with Cedar Wealth Partners they may enter into a financial planning agreement only and be charged a fixed planning fee agreed upon within the financial planning agreement

Please Note: It is always the client's responsibility to promptly notify Cedar Wealth Partners if there is any change in their financial situation or investment objective. This notification of change allows the Adviser an opportunity to review, evaluate, or revise our previous recommendations or services.

Additional Services –

The Adviser may furnish advice on matters not involving securities, such as:

Retirement Income Planning	Personal Financial Planning
Withdrawal Rate Analysis	Education Planning
Cash Flow & Budgeting	Employee Benefits & 401(k) Guidance
Life Insurance Review & Planning	Corporate Retirement Plan Guidance
Estate & Charitable Gift Planning	Tax Planning
Business Successions	Investment Planning
Trust Services	Annuities
Life Insurance	Long Term Care Insurance

Tailored Relationships

At Cedar Wealth Partners, advisory services are tailored to the specific needs of each client. Prior to providing advisory services, the Adviser will ascertain each client's investment goals and objectives. The Adviser then allocates and/or recommends that the client allocate investment assets consistent with the designated investment objective. The client may, at any time, impose reasonable restrictions on the Adviser's services, but restrictions must be delivered to the Adviser.

In performing services for the client, the Adviser is not required to verify any information it received from the client or from the client's other professionals and the Adviser is expressly authorized by the client to rely on this information. Each client is advised that it remains the client's responsibility to promptly notify the Adviser if there is ever any change in the client's financial situation or investment objectives for the purpose of reviewing, evaluating or revising the Adviser's previous recommendations or services to the client.

Managed Assets –

As of December 31, 2019, Wealth Advisory Solutions managed a total of \$609,012,188 in discretionary assets under management and \$41,850,397 in non-discretionary assets under management.

Item 5: Fees and Compensation

Managed Discretionary Asset Fees

The Advisor bases its annual investment management fee for managed discretionary assets upon a percentage (%) of the market value of the assets and the specific types of investment management services provided. The Advisor charges an annual fee of up to 2.75% of assets under management. The total Fee percentage includes both the Advisor Fee and the Investment Management Fee. The Advisor may choose to charge a lower asset based fee at its sole discretion.

Managed Non-Discretionary Asset Fees

The Advisor bases its annual investment management fee for managed non-discretionary assets upon a percentage (%) of the market value of the assets and the specific types of investment management services provided. The Advisor charges an annual fee of up to 2.75% of assets under management. The total Fee percentage includes both the Advisor Fee and the Investment Management Fee. The Advisor may choose to charge a lower asset based fee at its sole discretion.

Negotiated Fees

The Advisor, in its sole discretion, may reduce its investment management fee based upon certain factors, like anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client and other considerations.

Financial Planning Fees

Cedar Wealth Partners provides financial planning services to Investment Management clients at no additional cost. Financial planning agreements are executed separately then the Investment Advisor Agreements. For non-Investment Management clients that are interested in only financial planning with Cedar Wealth Partners they would only sign a financial planning agreement and their fee will be determined by the complexity and time involved in the financial planning. The fee will be predetermined and outlined in the contract before financial planning has begun for non-Investment Management clients.

The client can terminate the financial planning and/or advisory relationship at any time with a written notice.

Billing of Fees

Cedar Wealth Partners' investment management fees shall be assessed quarterly, in advance, based on the asset values as of the day prior to the period being billed. New accounts will be assessed a prorated fee dependent upon the number of days remaining in the quarter. Cedar Wealth Partners clients must provide their consent in advance to direct debiting of investment management fees from their custodial account. The Investment Advisory Agreement and the custodial/ clearing agreement authorize the custodian to debit the client account for the amount of the Adviser's investment management fee, and to directly remit that investment management fee to Cedar Wealth Partners in compliance with regulatory procedures. In the limited event that the Adviser bills the client directly, payment in full is expected upon presentation of the invoice.

In the event an agreement is terminated, the client will receive a prorated refund for fees paid in advance.

Other Fees

Unless clients direct otherwise or an individual client's circumstances require, the Adviser generally recommends TD Ameritrade. We are using TD Ameritrade serve as the broker-dealer/custodian for client investment accounts. TD Ameritrade may charge brokerage commissions and/or transaction fees for effecting certain securities transactions. TD Ameritrade may charge commissions for individual equity and fixed income securities transactions or fees may be charged for certain no-load mutual fund transactions. In addition to the Adviser's investment management fee, custodial brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses).

In addition, Adviser may recommend Separately Managed Accounts outside of TD Ameritrade or 529 accounts. In these cases, Adviser will charge a management fee for any of these types of assets under management. If there are additional third party manager on these accounts, they will also charge a fee. Accordingly, the client should review both the fees charged by the third-party managers and the fees charged by Adviser to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

For all services offered by the Adviser, the same or different services may be offered by other firms at the same, higher, or lower fees.

Commission Transactions

The Adviser primarily recommends the purchase of no-load institutional class mutual fund securities and/or exchange traded funds for implementing investment recommendations. Cedar Wealth Partners does not actively direct clients to traditional, full service /commission brokers. Most of the Adviser's clients do not use traditional brokers. As described earlier, Cedar Wealth Partners generally recommends using the services of a centralized custodian/discount broker.

Rollover Recommendations

There is a conflict of interest when a Cedar Wealth representative makes a recommendation that a participant roll over assets from a retirement account into a new or existing account or investment (e.g. rollover IRA) managed by

Cedar Wealth. The conflict of interest exists because Cedar Wealth will receive compensation (e.g., management fees) if the money is rolled over, but it will not if the recommendation is not accepted. In some cases, Cedar Wealth could have recommended that the participant leave his or her money in the plan and, in that case, the firm and its representative would not be compensated for their advice. Cedar Wealth will manage this conflict through a process designed to develop an informed recommendation in the best interest of the client.

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

The Adviser does not advise any client accounts that are subject to performance-based fee arrangements.

Item 7: Types of Clients

Description

The Adviser predominantly offers its services to individuals, high net worth individuals, pension and profit sharing plans and participants, trusts, estates, charitable organizations, corporations or business entities.

Account Minimums

Cedar Wealth Partners requires an account minimum for investment management services \$5,000. The account minimum fee charged quarterly by the adviser is \$0.

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

Methods of Analysis and Investment Strategies

The Adviser's security analysis methods may include fundamental analysis, technical analysis, charting and cyclical analysis.

The main sources of information for analysis 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.

Additional research tools and sources of information that the Adviser may use include mutual fund and stock information provided by unaffiliated third

parties (e.g., Morningstar, etc.) and many other reports located on the Internet using the World Wide Web.

The Adviser may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases: (securities held at least a year)
- Short Term Purchases: (securities sold within a year)
- Trading: (securities sold within thirty (30) days)
- Options (contract for the purchase or sale of a security at a predetermined price during a specific period of time)

Strategic and Tactical Asset Allocation may be utilized with domestic mutual funds, exchange-traded funds, or stocks and bonds as the core investments. Global mutual funds, sector funds and specialty exchange-traded funds may be added as satellite positions. Portfolios may be further diversified among large, medium and small sized investments in an effort to control the risk associated with traditional markets. Investment strategies designed for each client are based upon specific objectives stated by the client during consultations. Clients may change their specific objectives at any time. Each client executes an Investment Policy Statement that documents their specific objectives and their desired investment strategy.

Please Note: Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy recommended or undertaken by the Adviser will be profitable or equal any specific performance level. Investing in securities involves risk of loss that clients should be prepared to bear.

Risks of Loss

Risk is inherent in any investment in securities and the Adviser does not guarantee any level of return on a client's investments. There is no assurance that a client's investment objectives will be achieved. A client may be subject to certain risks, including, but not limited to, the risks described below. The risks discussed below vary by investment style or strategy, and may or may not apply to a client. A client should also review the prospectuses or other disclosure documents for the securities purchased for the client's account, as they will contain important information about the risks associated with investing in such securities.

Investment strategies recommended by the Adviser may also be subject to some or all of the following types of risk:

- **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 may 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 investors are interested in buying or selling 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.
- **Active Trading Model Risk:** The strategy to manage a model portfolio may involve an above average portfolio turnover that could negatively impact clients' net after tax gains. While Cedar Wealth Partners seeks to ensure that clients' assets are managed in a manner consistent with their individual financial situations and investment objectives provided in the Client Profile, securities transactions effected pursuant to a model investment strategy are usually done without regard to a client's individual tax ramifications. Moreover, the model can incur significantly higher transaction costs.
- **Credit Risk:** The risk of default on a debt that may arise from a borrower failing to make required payments.

Please Note: In light of these risks of loss and potentially enhanced volatility, clients may direct the Adviser not to employ any or all of the investment strategies recommended by Cedar Wealth Partners for their account.

Item 9: Disciplinary Information

Legal and Disciplinary

Investment Advisors are required to disclose legal or disciplinary events that are material to a client's or prospective client's evaluation of the Advisor's business or the integrity of the Advisor's management. WAS and Cedar Wealth Partners have no legal or disciplinary events to report.

Item 10: Other Financial Industry Activities and Affiliations

Other Financial Industry Activities

The Adviser is not registered as a securities broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor.

Canterbury Relationship Disclosure

Wealth Advisory Solution, LLC ("WAS") employee and principal owners Kim Custer are also employed by, and licensed with Canterbury Investment Management ("Canterbury"). Canterbury is a SEC-registered investment adviser providing discretionary asset management services including, asset allocation, model portfolios, portfolio construction and design, performance monitoring of client accounts, an approved list of investment managers, a mutual fund and other investment products. Canterbury can provide discretionary asset management services for clients of WAS and can assist WAS with certain asset allocation and trade management activities. The Adviser may allocate a portion of client's investment to mutual funds advised by Canterbury. Canterbury charges an asset management fee that is separate from any other fees you pay to the adviser. The fee will be specified in your agreement. Please note, the investment services of Canterbury provided by individuals dually employed at WAS could result in additional compensation based general performance bonuses.

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

Code of Ethics

The Adviser maintains an investment policy for personal securities transactions at its business and it is part of the Adviser's general Code of Ethics (the "Code"). The Adviser establishes the standard of business

conduct for all employees that are based on the fundamental principles of openness, integrity, honesty and trust. The Adviser also maintains and enforces written policies reasonably designed to prevent the Adviser or any person associated with Adviser from misusing material non-public information to comply with Section 204A of the Investment Advisers Act. Neither the Adviser, nor any related person of the Adviser, will recommend, buy, or sell securities within client accounts which the Adviser or a related person of the Adviser may have a material financial interest. A copy of the Adviser's Code is available to any client or potential client upon request.

Participation or Interest in Client Transactions

The Adviser and/or its representatives may engage in securities transactions for their own accounts, including the same or related securities that are recommended to or owned by clients of the Adviser. These transactions may include trading in securities in a manner that differs from, or is inconsistent with, the advice given to clients of the Adviser, and the transactions may occur at or about the same time that such securities are recommended to or are purchased or sold for client accounts. This creates a potential for a conflict between the interest of the clients and the interests of the Adviser and/or its representatives.

Personal Trading

To address the potential for conflict of interests, the Adviser has adopted a Code that applies to its representatives who have access to non-public information relating to advisory client accounts ("Access Persons"). The Code prohibits Access Persons from using knowledge about advisory client account transactions to profit personally, directly or indirectly, by trading in his/her personal accounts.

Item 12: Brokerage Practices

Broker-Dealer Selection

The Adviser selects broker-dealers to execute trade order for a client's account, unless the client has provided instructions to the Adviser to the contrary. As an investment adviser, the Adviser has an obligation to seek "best execution" of client trade orders. "Best execution" means that the Adviser must place client trade orders with those broker-dealers that the Adviser believes are capable of providing the best qualitative execution of client trade orders under the circumstances, taking into account the full range and quality of the services offered by the broker-dealer. When selecting a broker or dealer, the Adviser may consider the following factors: (i) client preferences, (ii) execution capability and past execution performance, (iii) access to markets, (iv) commission rates, (v) financial standing of executing firm and counterparty risk, (vi) timeliness in rendering services, (vii)

availability, cost and quality of custodial services, and (vii) continuity and quality of the overall provision of services.

The Adviser may also purchase or sell debt securities through electronic trading platforms. These electronic trading platforms typically provide access to bids and offers from a greater number of dealers on a timely basis; however, these electronic platforms may impose an execution or transaction fee imbedded in the price paid or received for the security (i.e., a markup or markdown).

TD Ameritrade Institutional Program

Wealth Advisory Solution, LLC ("WAS") participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") is a member of FINRA and SIPC. TD Ameritrade is an independent SEC-registered broker dealer. TD Ameritrade and the WAS are separate and unaffiliated. TD Ameritrade offers services to independently registered investment advisers which include custody of securities, trade execution, and clearance and settlement of transactions. WAS receives some benefits from TD Ameritrade through its participation in the TD Institutional program. WAS receives some benefits from TD Ameritrade through its participation in the TD Institutional program. WAS receives some benefits from TD Ameritrade through its participation in the TD Institutional program. WAS may recommend TD Ameritrade to clients for custody and brokerage services. WAS receives economic benefits through its participation in the TD Ameritrade Institutional Program which may include any one or more of the following: Advanced reporting and billing capabilities to increase productivity, provides better transparency for clients. WAS, through its participation in the program, may receive discounts on compliance, marketing, technology and practice management products or services provided to WAS by third party vendors. These benefits received by WAS, or its associated persons, do not depend on the amount of brokerage transactions directed to TD Ameritrade. Participation in the TD Ameritrade Institutional program could create a potential conflict of interest. BY receiving Additional Services, WAS will receive certain additional economic benefits which may or may not be offered to any other independent advisors that participate in the Additional Services Program. WAS may have a conflict of interest in recommending to its clients that their assets be held in custody with TD Ameritrade and in placing transactions with TD Ameritrade, because TD Ameritrade considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, WAS' client accounts when determining whether to provide or continue providing Additional Services to WAS; and that WAS' receipt of Additional Services does not diminish WAS' duty to act in the best interests of their clients, including the seek the best execution of trades for client accounts.

Research and Other Soft Dollar Benefits

Cedar Wealth Partners may receive brokerage and research services from its qualified custodian, TD Ameritrade. Further, Cedar Wealth Partners may receive software services and technology for market research and analysis from TD Ameritrade. These services are for the benefit of Cedar Wealth Partners in consideration of the Adviser's allocation of brokerage transactions made on behalf of clients (on both an agency and net basis) and may not directly benefit client accounts. In addition, TD Ameritrade has provided the Adviser with transition assistance contingent upon custodizing the Adviser's assets under management with TD Ameritrade for a period of five years. This transition assistance is intended to assist the Adviser with start-up costs, including rent, overhead expenses, computers, monies owed to third parties and similar costs. The receipt of these benefits may influence Cedar Wealth Partners decision regarding recommending that clients establish accounts at TD Ameritrade, based on Cedar Wealth Partners interest in receiving TD Ameritrade's services that benefit the Adviser's business rather than based on the client's interest in receiving the best value in custody services and the most favorable execution of client transactions. This is a potential conflict of interest. Cedar Wealth Partners believes, however, that its recommendation of TD Ameritrade as custodian and broker is in the best interests of its clients. Cedar Wealth Partners believes that its clients do not pay more for investment transactions effected and assets maintained at TD Ameritrade as a result of these arrangements. Cedar Wealth Partners' selection is primarily supported by the scope, quality, and price of TD Ameritrade's services and not TD Ameritrade's services that benefit only Cedar Wealth Partners.

Order Aggregation, Allocation and Rotation Practices

In order to seek best execution for clients, the Adviser may aggregate contemporaneous buy and sell orders for the accounts over which it has discretionary authority. This practice of bunching trades may enable the Adviser to obtain more favorable execution, including better pricing and enhanced investment opportunities, than would otherwise be available if orders were not aggregated. Bunching transactions may also assist the Adviser in potentially avoiding an adverse effect on the price of a security that could result from simultaneously placing a number of separate, successive or competing, client orders.

It is within the Adviser's sole discretion to bunch transactions and its decision is subject to its duty to seek best execution. The Adviser will aggregate a client's trade orders only when the Adviser deems it to be appropriate and in the best interests of the client and permitted by regulatory requirements.

All advisory clients participating in a bunched transaction will receive the same execution price for the security bought or sold. Average prices may be used when allocating purchases and sales to a client's accounts because such securities may be purchased and sold at different prices in a series of bunched transactions. As a result, the average price received by a client may be higher or lower than the price the client may have received had the transaction been effected for the client independently from the bunched transaction. In addition, a client's transaction costs may vary depending upon, among other things, the type of security bought or sold, and the commission or markup or markdown charged by the executing broker-dealer.

The amount of securities available in the marketplace, at a particular price at a particular time, may not satisfy the needs of all clients participating in a bunched transaction and may be insufficient to provide full allocation across all client accounts. To address this possibility, the Adviser has adopted trade allocation policies and procedures that are designed to make securities allocations to discretionary client accounts in a manner such that all such clients receive fair and equitable treatment. If a bunched transaction cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day will generally be allocated pro rata among the clients participating in the bunched transaction. Adjustments to this pro rata allocation may be made, at the discretion of the Adviser, to take into consideration account specific investment restrictions, undesirable position size, account portfolio weightings, client tax status, client cash positions and client preferences. Adjustments may also be made to avoid a nominal allocation to client accounts.

When the Adviser is not able to aggregate trades, the Adviser generally uses a trade rotation process that is designed to be fair and equitable to its clients.

Directed Brokerage

The Adviser will comply with any guidelines and/or limitations reasonably requested by a client relating to brokerage for the client's account that are contained in the client's investment management agreement. When possible, the Adviser will also observe any non-binding statement of client preferences with respect to brokerage direction.

If a client directs the Adviser to use a particular broker-dealer for execution of the client's trade orders (a "directed brokerage arrangement"), and the Adviser agrees to the arrangement, a client should understand that the Adviser may be unable to achieve best execution for the client's transactions. Any costs related to the directed brokerage arrangement are not included in the Adviser's fee, and the client is solely responsible for monitoring, evaluating and reviewing the arrangement with the directed broker-dealer and paying any commissions or markups or markdowns or other costs imposed by

the directed broker-dealer. Additionally, the Adviser generally will not aggregate the client's directed brokerage trade orders with orders for other clients of the Adviser or include such orders in its trade rotation process.

If the Adviser aggregates a client's directed brokerage trade orders with trade orders for other clients of the Adviser, the Adviser may employ the use of "step-outs" to satisfy the client's directed brokerage arrangement. A "step-out" occurs when an executing broker executes the trade and then "steps out" the trade to a clearing broker (which would be the directed broker-dealer in a directed brokerage arrangement) that confirms and settles the trade. In such a case, a client will bear the costs of any commissions, markups or markdowns imposed by the executing broker-dealer in addition to the costs of any commissions, markups or markdowns imposed by the directed broker-dealer.

If a client directs the Adviser to use a particular broker-dealer, and if the particular broker-dealer referred the client to the Adviser or if the particular broker-dealer refers other clients to the Adviser in the future, the Adviser may benefit from the client's directed brokerage arrangement. Because of these potential benefits, the Adviser may have an economic interest in having the client continue the directed brokerage arrangement. The benefits that the Adviser receives may conflict with the client's interest in having the Adviser recommend that the client utilize another broker-dealer to execute some or all transactions for the client's account.

Before directing the Adviser to use a particular broker-dealer, a client should carefully consider the possible costs or disadvantages of directed brokerage arrangements.

Trading Error Policy

If there is a trade error for which the Adviser is responsible, trades will be adjusted or reversed as needed in order to put the client's account in the position that it would have been in as if the error had not occurred. Errors caused by the Adviser will be corrected at no cost to client's account, with the client's account not recognizing any loss from error. The client's account will be fully compensated for any losses incurred as a result of any such error. If the trade error results in a gain, the gain may be retained by the Adviser. Please note that any gains resulting from a trade error will be donated to charity.

Item 13: Review of Accounts

Periodic Reviews

The Adviser's portfolio management team generally performs daily reviews on transactions in each client account. The portfolio management team

generally reviews reports documenting each account's performance compared to the performance of a relevant benchmark index at least monthly.

Review Triggers

In addition to periodic reviews, the Adviser **may** conduct account reviews when a triggering event, like a change in client investment objectives, financial situation, market correction or client request occurs.

Regular Reports and Electronic Delivery

The Adviser generally provides written investment summary reports to clients on a monthly basis. These monthly investment summary reports contain the client account's holdings, yield, cash flow, gains and losses, and monthly interest earnings. The Adviser may provide additional information in the investment summary report to meet the specific reporting needs of a client as the client and the Adviser may agree.

All client correspondence, as well as all books and records of the Adviser, will be delivered and stored as electronic images and the originals of the electronically stored documents shall be destroyed. Thereafter, all electronic documents shall be deemed to serve as an original copy.

Item 14: Client Referrals and Other Compensation

Other Compensation

As disclosed under Item 12 above, WAS participates in TD Ameritrade's institutional customer program and WAS may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between WAS' participation in the program and the investment advice it gives to its Clients, although WAS receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to WAS by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by WAS' related persons. Some of the products and services made available by TD

Ameritrade through the program may benefit WAS but may not benefit its Client accounts. These products or services may assist WAS in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help WAS manage and further develop its business enterprise. The benefits received by WAS or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, WAS endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by WAS or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

WAS also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. TD Ameritrade provides the Additional Services to WAS in its sole discretion and at its own expense, and WAS does not pay any fees to TD Ameritrade for the Additional Services. WAS and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services. WAS' receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to WAS, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, WAS' Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with WAS, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, WAS may have an incentive to recommend to its Clients that the assets under management by WAS be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. WAS' receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

Client Referrals

It is the Adviser's policy not to engage solicitors or to pay related or non-related persons for referring potential clients.

Item 15: Custody

Custody

Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them. Cedar Wealth Partners

does not have direct custody of any client funds and/or securities. Cedar Wealth Partners does not take physical custody of client funds and/or securities under any circumstances. Clients' funds and securities are held by an unaffiliated qualified custodian. Please refer to Item 12 for information regarding our Brokerage Practices. Cedar Wealth Partners has implemented written policies and procedures to ensure that it will be in compliance with the required requirements and applicable safeguards with respect to custody. While Cedar Wealth Partners does not have physical custody of client funds or securities, the custodian may pay Cedar Wealth Partners' management fees through a deduction from the custodial brokerage account that holds client funds. Prior to permitting direct debit of fees, each client provides written authorization permitting fees to be paid direct from the custodian. As part of the billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. The custodian does not calculate the amount of the fee to be deducted and does not verify the accuracy of Cedar Wealth Partners' advisory calculation. Therefore, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact Cedar Wealth Partners directly if they believe that there may be an error in their statement.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for the client accounts. The client will also receive monthly statements regarding the account directly from the broker-dealer/custodian. When you receive these statements, please review the statements carefully. Please compare asset values, holdings, and fees to the account statement issued for the previous period. At its sole discretion, Cedar Wealth Partners may send such other updates or periodic reports, as it deems appropriate, to clients.

Please Note: To the extent that Cedar Wealth Partners may provide clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Cedar Wealth Partners with the account statements received from the account custodian.

Item 16: Investment Discretion

Discretionary Authority for Trading

Clients can determine to engage the Adviser to provide investment advisory services on a discretionary basis. Prior to the Adviser assuming discretionary authority over a client's account, the client is required to execute an investment management agreement with the Adviser, naming the Adviser as client's attorney and agent in fact, granting the Adviser full authority to buy,

sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

The Adviser generally accepts reasonable limitations to its discretionary authority with respect to brokerage direction and securities selection, including the designation of particular securities or types of securities that should not be purchased for the client's account, but the client may not require that particular funds or securities (or types) be purchased for the client's account. Any such limitations agreed to by a client and the Adviser are generally included as an addendum to the client's investment management agreement or in a separate letter of understanding. When possible, the Adviser will also attempt to observe any non-binding statement of client preferences with respect to factors such as brokerage direction, holding periods, and securities selection.

Non-Discretionary Authority for Trading

Clients may also select the Adviser's non-discretionary service module. Clients retain final say in investment selection and decision making. The Adviser works closely with the client to tailor investment strategy to the client's goals and needs, and consults with the client prior to making trades or other changes to the investment portfolio. The Adviser proactively provides the client with investment ideas and a view on current market situations but no transactions are carried out without prior client approval. The Adviser's non-discretionary services also include, amongst other things, (i) careful monitoring of the client's portfolio to ensure that it remains within investment guidelines; (ii) regular performance updates; and (iii) access to seasoned investment professionals prior to making final investment decisions.

Item 17: Voting Client Securities**Proxy Votes**

Adviser has adopted the following policies and procedures regarding proxy voting for its clients' accounts. At all times, Adviser has a "duty of care" to its clients, and Adviser recognizes and accepts this responsibility. Should the Adviser exercise voting authority over its clients' proxies, it must ensure that all proxies are handled in the best interests of its clients.

Currently, Adviser has chosen not to retain voting authority over its clients' proxy voting and has left the voting authority to the clients. All proxy ballots will be sent directly to a client and not the Adviser.

Any questions on these policies and procedures should be directed to Matt Swendiman who is responsible for updating, maintaining or changing these procedures.

Item 18: Financial Information

Financial Information

The Adviser does not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance and, thus, has not included a balance sheet dated not more than 90 days prior to the date of this brochure. The Adviser is not aware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments to clients, nor has it been the subject of a bankruptcy petition at any time during the past ten years.

Privacy Policy

Cedar Wealth Partners does not disclose nonpublic personal information about its clients or former clients to third parties other than as described below. Cedar Wealth Partners collects information about its clients (such as name, address, social security number, assets and income) from the Firm's discussions with clients, from documents that clients may deliver to the Firm (such as subscription documents) and in the course of providing services to clients. In order to service clients' accounts and effect investment transactions, Cedar Wealth Partners may provide clients' personal information to the Firm's affiliates and to firms that assist Cedar Wealth Partners in servicing client accounts and have a need for such information, such as brokers, distributors, legal counsel, fund administrators, or accountants. Cedar Wealth Partners does not otherwise provide information about clients to outside firms, organizations, or individuals except as required or permitted by law. Any party that receives this information will use it only for the services required and as allowed by applicable law or regulation, and is not permitted to share or use this information for any other purpose.

Brochure Supplement

(Part 2B of Form ADV)

DAVID HOBBS

Investment Adviser Representative

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NOTICE: The attached Brochure Supplement provides information about the Investment Adviser Representative of Wealth Advisor Solutions, LLC doing business as Cedar Wealth Partners (“Cedar Wealth Partners” or the “Firm”). You should have received a copy of the Brochure for Cedar Wealth Partners, CRD No. 288903, as well. Please contact Matt Swendiman, if you did not receive the Firm’s Part 2A of Form ADV. You can also contact Matt Swendiman if you have any questions about the content of the attached supplement.

Additional information about the Firm’s investment adviser representatives is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. David Hobbs’s CRD number is 5004505.

March 28th 2020

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Cedar Wealth Partners

A. General Requirements

Generally, Cedar Wealth Partners employees hold a college or advanced degree or have relevant working experience in the securities industry. Any employee of Cedar Wealth Partners acting in a representative capacity will be appropriately licensed or registered.

B. Investment Adviser Representative Information

Cedar Wealth Partners currently has four (4) investment adviser representatives. This Brochure Supplement provides information about David Hobbs, the Firm's investment adviser representative.

Item 2 Education and Business Experience

CRD Number: 5004505

Year of Birth: 1983

PROFESSIONAL EXPERIENCE:

• Cedar Wealth Partners	IAR	2019 – Present
• Wealth Advisory Solutions	IAR	2019 - Present
• LPL	Advisor	2016 – 2019
• Lincoln Financial	Consultant	2008 – 2015
• Comcast	Financial Consultant	2007 – 2008
• World Gospel Mission in Kampala Uganda	Business Manager	2006 – 2007

EDUCATION:

- Taylor University – Business Management, 2006

PROFESSIONAL DESIGNATIONS:

Mr. Hobbs holds both the Certified Financial Planner (CFP®) and Certification for Long Term Care (CLTC) designations. More information on each of the designations can be found below.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

The Certification in Long-Term Care (CLTC®) designation focuses on the multiple challenges a client faces when providing care over a prolonged amount of time.

Professionals holding a CLTC® designation have dedicated themselves to assist clients in mitigating financial, physical and emotional life events through extended care planning to assist the client and their family years down the road.

The CLTC® designation was created in 1999 and has been recognized and supported by The American College, NAIFA, NAHU and major insurance carriers.

Item 3 Disciplinary Information

Mr. Hobbs does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

Item 4 Other Business Activities

Mr. Hobbs has the following outside business activities:

- Board member for AdTec, Administration and Technical Consulting Inc.
- Owner and Partner of Cedar Wealth Partners Insurance, LLC

Item 5 Additional Compensation

Mr. Hobbs receives a payment once a year from the AdTec board. The amount does not exceed 5% of his annual income.

Mr. Hobbs conducts insurance business through Cedar Wealth Partners Insurance, LLC. The amount of compensation earned does not exceed 5% of his annual income or take more than 5% of his time monthly.

Item 6 Supervision

Mr. Hobbs is Co-Founder and Investment Adviser Representative of Cedar Wealth Partners. Cedar Wealth Partners has and provides investment advisory and supervisory services in accordance with its policies and procedures manual. The Firm's Chief Compliance Officer, Matt Swendiman, is primarily responsible for implementation of the Firm's policies and procedures.

Brochure Supplement

(Part 2B of Form ADV)

JEFF ALLEN SPENCER

Investment Adviser Representative

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Additional information about the Firm’s investment adviser representatives is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. Jeff Allen Spencer’s CRD number is 4042757.

March 28th 2020

A. General Requirements

Generally, Cedar Wealth Partners employees hold a college or advanced degree or have relevant working experience in the securities industry. Any employee of Cedar Wealth Partners acting in a representative capacity will be appropriately licensed or registered.

B. Investment Adviser Representative Information

Cedar Wealth Partners currently has four (4) investment adviser representatives. This Brochure Supplement provides information about Jeff Allen Spencer, the Firm's investment adviser representative.

Item 2 Education and Business Experience

CRD Number: 4042757

Year of Birth: 1945

PROFESSIONAL EXPERIENCE:

• Cedar Wealth Partners	IAR	2019 – Present
• Wealth Advisory Solutions	IAR	2019 – Present
• The Spencer Group, Inc.	President	2004 – Present
• Innsbruck Financial Consultants, LLC	Managing Member	2004 – 2019
• Mutual Service Corporation	Registered Rep.	2001 – 2006
• CSSC Investment Advisory Services	IAR	1999 – 2004
• SMA Financial Services, Inc	President	1999 – 2004
• Spencer Miller & Associates CPAs, LLC	Managing Member	1981 – 2004

EDUCATION:

- Northern Illinois University, MBA, 1971
- Southern Illinois University, BS Accounting, 1967

PROFESSIONAL DESIGNATIONS:

Mr. Spencer does not hold any additional designations.

Item 3 Disciplinary Information

Mr. Spencer does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

Item 4 Other Business Activities

Mr. Spencer is currently serving as President of The Spencer Group.

Item 5 Additional Compensation

Mr. Spencer does not earn any additional compensation from outside locations that have already been disclosed.

Item 6 Supervision

Mr. Spencer is an Investment Adviser Representative of Cedar Wealth Partners. Cedar Wealth Partners has and provides investment advisory and supervisory services in accordance with its policies and procedures manual. The Firm's Chief Compliance Officer, Matthew Swendiman, is primarily responsible for implementation of the Firm's policies and procedures.

Brochure Supplement

(Part 2B of Form ADV)

DALTON KLOEKER

Investment Adviser Representative

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NOTICE: The attached Brochure Supplement provides information about the Investment Adviser Representative of Wealth Advisory Solutions, LLC doing business as Cedar Wealth Partners (“Cedar Wealth” or the “Firm”). You should have received a copy of the Brochure for Cedar Wealth, CRD No. 288903, as well. Please contact Matt Swendiman, if you did not receive the Firm’s Part 2A of Form ADV. You can also contact Matt Swendiman if you have any questions about the content of the attached supplement.

Additional information about the Firm’s investment adviser representatives is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. Dalton Kloeker’s CRD number is 7238159.

March 28th 2020

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Cedar Wealth Partners

A. General Requirements

Generally, Cedar Wealth employees hold a college or advanced degree or have relevant working experience in the securities industry. Any employee of Cedar Wealth acting in a representative capacity will be appropriately licensed or registered.

B. Investment Adviser Representative Information

Cedar Wealth currently has four (4) investment adviser representatives. This Brochure Supplement provides information about Dalton Kloeker, the Firm's investment adviser representative.

Item 2 Education and Business Experience

CRD Number: Needed

Year of Birth: 1996

PROFESSIONAL EXPERIENCE:

- | | | |
|-------------------------|-----------------|----------------|
| • Cedar Wealth Partners | IAR | 2020 – Present |
| • Kloeker Coaching | Financial Coach | 2019-2020 |

EDUCATION:

- Bachelor of Arts from University of Indianapolis

Item 3 Disciplinary Information

Dalton Kloeker does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

Item 4 Other Business Activities

Dalton Kloeker is engaged in the following outside business activities:

- Technician at Music & Arts

Item 5 Additional Compensation

No outside of wages received from Music & Arts

Item 6 Supervision

Dalton Kloeker is an Investment Adviser Representative of Cedar Wealth. Cedar Wealth has and provides investment advisory and supervisory services in accordance with its policies and procedures manual. The Firm's Chief Compliance Officer, Matt Swendiman, is primarily responsible for implementation of the Firm's policies and procedures.

Brochure Supplement

(Part 2B of Form ADV)

RICK B. DAVIS

Investment Adviser Representative

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Additional information about the Firm’s investment adviser representatives is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. Rick B. Davis’ CRD number is 6991717.

March 28th 2020

A. General Requirements

Generally, Cedar Wealth employees hold a college or advanced degree or have relevant working experience in the securities industry. Any employee of Cedar Wealth acting in a representative capacity will be appropriately licensed or registered.

B. Investment Adviser Representative Information

Cedar Wealth currently has four (4) investment adviser representatives. This Brochure Supplement provides information about Rick B. Davis, the Firm's investment adviser representative.

Item 2 Education and Business Experience

CRD Number: 6991717

Year of Birth: 1967

PROFESSIONAL EXPERIENCE:

- | | | |
|-------------------------|-----------|----------------|
| • Cedar Wealth Partners | IAR | 2019 – Present |
| • Q4 Advisors | President | 2018 – Present |
| • Henriott Group | CEO | 2001 – 2018 |

EDUCATION:

- BS in Accounting, Butler University, 1989
- Masters of Science in Management, Krannert School of Management, Purdue University, 2000

Item 3 Disciplinary Information

Mr. Davis does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

Item 4 Other Business Activities

Mr. Smith is engaged in the following outside business activities:

- Q4 Advisors – Provides insurance based products since October of 2018

This outside business activity does not require more than 30 hours of Mr. Davis' time per week.

- Purdue University – Part time instructor in Entrepreneurship program.

This outside business activity does not require more than 6 hours of Mr. Davis' time per week.

Item 5 Additional Compensation

Mr. Davis receives additional compensation from the outside business activities listed above. The compensation from Purdue University makes up around 15% of his income while the compensation from Q4 Advisors makes up over 50% of his income.

Item 6 Supervision

Mr. Davis is an Investment Adviser Representative of Cedar Wealth. Cedar Wealth has and provides investment advisory and supervisory services in accordance with its policies and procedures manual. The Firm's Chief Compliance Officer, Matt Swendiman, is primarily responsible for implementation of the Firm's policies and procedures.