



NewDay Solutions, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 24, 2020

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of NewDay Solutions, LLC (“NewDay” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (800) 834-2101.

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

Additional information about NewDay and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 282163.

NewDay Solutions, LLC
1 Park Ave, Suite 4, Hampton, NH 03842-2113
Phone: (800) 834-2101
<http://NewDaySolutions.com>

Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of NewDay. For convenience, the Advisor has combined these documents into a single disclosure document.

NewDay believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. NewDay encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

There have been no material changes to this disclosure Brochure since the last filing and distribution to Clients

Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 282163. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (800) 834-2101.

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Item 4 – Advisory Services

A. Firm Information

NewDay Solutions, LLC (“NewDay” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). NewDay is located in the State of New Hampshire and is organized as a limited liability company (“LLC”) under the laws of New Hampshire. NewDay was founded in July 2014 and became a registered investment advisor in January 2016. NewDay is owned and operated by Kathleen M. Thomas (President and Lead Wealth Advisor). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by NewDay.

B. Advisory Services Offered

NewDay offers investment advisory services to individuals and high net worth individuals (each referred to as a “Client”).

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

Investment Advisory Services

NewDay provides customized wealth management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. NewDay works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an investment strategy.

NewDay will develop a long-term asset allocation that serves as the core portfolio strategy for each client. In addition, the Advisor will employ a tactical overlay for a portion of the Client’s portfolio. Portfolios are primarily constructed using mutual funds, exchange-traded funds (“ETFs”), and individual equities securities. The Advisor may also utilize covered options and other types of investments, as appropriate, to meet the needs of each particular Client. The Advisory will retain certain legacy investments based on portfolio fit and/or tax considerations.

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

NewDay evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. NewDay may recommend, on occasion, redistributing investment allocations to diversify the portfolio. NewDay may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. NewDay may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will NewDay accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the advisory agreement. Please see Item 12 – Brokerage Practices.

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Financial Planning Services

NewDay will typically provide a variety of financial planning services to individuals and families. Services may be offered as part of an overall investment advisory relationship or a separate financial planning engagement. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. NewDay may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

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

C. Client Account Management

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

These services may include:

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

D. Wrap Fee Programs

For Client that establish their accounts at Raymond James Financial, Inc. ("Raymond James"), New Day includes securities transaction fees (herein "Covered Costs") together with its investment advisory fees. The inclusion of these costs into the investment advisory fee is considered a "wrap fee program". While traditional wrap fee programs often have a rigid set of investment options and uniform trading practices, NewDay customizes its investment advisory services for each of its Clients. Depending on the level of trading required for the Client's account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 – Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure.

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E. Assets Under Management

As of December 31, 2019, NewDay manages \$136,318,537 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

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

A. Fees for Advisory Services

Investment Advisory Services

Investment advisory fees are paid monthly, in advance of each calendar month, pursuant to the terms of the investment advisory agreement. Investment advisory fees are at an annual rate ranging from 0.75% to 1.25% based on the market value of assets under management at the end of the prior calendar month. Fees are based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, the inclusion of financial planning services and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

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

Financial Planning Services

Financial planning services may be included as part of the Advisor's investment advisory fee or billed separately, pursuant to the terms of the agreement[s] with the Advisor. NewDay offers financial planning services on an hourly basis or for a fixed fee, or as an ongoing retainer. Hourly engagements are billed at a rate of up to \$300. Fixed fee engagements are offered based on the expected effort and duration at the Advisor's hourly rate. Ongoing financial planning services are billed \$6,000 to \$12,000 a year. Fees may be negotiable depending on the nature and complexity of each Client's circumstances and the experience of the personnel providing services. An estimate for total hours and/or costs will be provided to the Client in advance of engaging for these services.

B. Fee Billing

Investment Advisory Services

Investment advisory fees will be calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective month-end date. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total assets under management with NewDay at the end of each month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients provide written authorization permitting advisory fees to be deducted by NewDay to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Financial Planning Services

Financial planning fees are invoiced up to fifty percent (50%) upon execution of the financial planning agreement and with the balance due upon receipt of the agreed upon deliverable[s]. Ongoing retainer fees are invoiced by the Advisor in advance of each calendar quarter. The Advisor typically requires payment for financial planning fees via ACH or credit card billing, but may, on an exception basis use other payment methods. The Advisor may also arrange for the deduction of planning fees from the Client's account[s] at the Custodian. Certain Clients may have their planning fees included with their overall investment advisory fees.

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C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than NewDay in connection with investments made on behalf of the Client's account[s]. NewDay includes Covered Costs as part of its overall investment advisory fee through the NewDay Wrap Fee Program. Securities Transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

In addition, all fees paid to NewDay for investment advisory services or part of the NewDay Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of NewDay, but would not receive the services provided by NewDay which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by NewDay to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Advisory Services

NewDay is compensated for its investment advisory services in advance of the month in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the month. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Financial Planning Services

NewDay requires an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be responsible for planning fees based on the hours incurred or in the event of a fixed fee engagement, the percentage of the engagement completed. For ongoing financial planning engagements, fees are prorated up to the date of termination. The Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the month. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

NewDay does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Certain Advisory Persons are also licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of the Advisor who are insurance agents have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Advisor. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

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

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

Item 7 – Types of Clients

NewDay offers investment advisory services to individuals and high net worth individuals. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. NewDay generally does not impose a minimum size for establishing a relationship. However, smaller accounts may be subject to different investment selection and strategies.

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

A. Methods of Analysis

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

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

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

B. Risk of Loss

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

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

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

Market Risks

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

ETF Risks

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

Mutual Fund Risks

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

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

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

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving NewDay or its owner. NewDay values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 282163.

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agency Affiliations

As noted in Item 5, certain Advisory Persons of NewDay are also licensed insurance professionals. NewDay and its Advisory Persons maintain insurance licensing to assist Clients, but do not seek to earn additional compensation in the form of commissions. NewDay may refer the Client to unaffiliated insurance professionals or firms, which will receive a commission for the implementation of recommendations. If NewDay implements an insurance product for a Client, they will first seek products that do not pay a commission. If a commissionable product is deemed the best option for the Client and is implemented directly by NewDay or its Advisory Persons, NewDay will seek to have commissions waived or rebated to the Client. If the commission cannot be waived or rebated, NewDay will coordinate with the Client to donate the commission to a charity, as allowable by law. Clients are under no obligation to implement any recommendations made the Advisor or its Advisory Persons.

Other Registered Investment Advisor Affiliation

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Certain Advisory Persons are each an Investment Advisor Representatives ("IAR") of Mid Atlantic Financial Management, Inc ("Mid Atlantic") (CRD# 109771). As an IAR with Mid Atlantic, Advisory Persons will receive investment advisory fees for investment management services offered. Advisory Persons will provide each Client with Mid Atlantic's Form ADV 2A or equivalent disclosure brochure, in advance of providing investment management services. At no time will Advisory Persons or the Advisor earn both ongoing investment advisory fees under the Advisor and ongoing investment advisory fees through Mid Atlantic on the same investment assets.

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

A. Code of Ethics

NewDay has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with NewDay ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. NewDay and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of NewDay Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (800) 834-2101.

B. Personal Trading with Material Interest

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

C. Personal Trading in Same Securities as Clients

NewDay allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of NewDay have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by NewDay requiring reporting of personal securities trades by its employees for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

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

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

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

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Where NewDay does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by NewDay. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. NewDay recommends that Clients establish their accounts with Raymond James Financial, Inc. ("Raymond James"), where the Advisor maintains an institutional relationship. Please see Item 14 below.

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

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

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

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

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. NewDay will execute its transactions through the Custodian as authorized by the Client, unless otherwise directed in writing by the Client. NewDay may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Investments in Client accounts are monitored on a regular and continuous basis by the Kathleen Thomas, the Chief Compliance Officer of NewDay. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

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

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C. Review Reports

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

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by NewDay

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

Participation in Institutional Advisor Platform

The Advisor has established an institutional relationship with Raymond James to assist the Advisor in managing Client account[s]. Access to the Raymond James Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Raymond James. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

During the initial start-up of the Advisor in 2016, Ms. Thomas received financial assistance and a commercial loan from Raymond James to assist the Advisor with the initial launch of its business and the transition of Client accounts to Raymond James. The transition assistance was paid to Ms. Thomas and required a five-year commitment to utilize Raymond James as its Custodian. The transition assistance was provided to assist with start-up expenses, reimbursement of client account transfer cost, technology and other aspects to assist Ms. Thomas with the launch of the Advisor. The terms of the agreement stipulate that If the Advisor transfers assets away from Raymond James prior to the end of the five-year period, a portion of the transition assistance may be required to be repaid to Raymond James. The commercial loan provided to the Advisor had monthly payments of principal and interest for a five-year term, but no prepayment penalty. The loan has been repaid in full to Raymond James. Neither the Advisor nor Ms. Thomas has received any additional financial support.

Additionally, the Advisor may receive the following benefits from Raymond James: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

B. Client Referrals from Solicitors

NewDay does not engage paid solicitors for Client referrals.

Item 15 – Custody

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

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Item 16 – Investment Discretion

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

Item 17 – Voting Client Securities

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

Item 18 – Financial Information

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



NewDay Solutions, LLC

Form ADV Part 2A Appendix 1 ("Wrap Fee Program Brochure")

Effective: March 24, 2020

This Form ADV 2A - Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices for NewDay Solutions, LLC ("NewDay" or the "Advisor") services when Client transaction costs are combined with investment advisory fees. This Wrap Fee Program Brochure shall always be accompanied by the NewDay Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete NewDay Disclosure Brochure or you have any questions about the contents of this Wrap Fee Program Brochure or the NewDay Disclosure Brochure, please contact the Advisor at (800) 834-2101.

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

Additional information about NewDay and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 282163.

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Item 2 – Material Changes

Form ADV 2 - Appendix 1 provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses wrap fee programs offering by the Advisor.

Material Changes

There have been no material changes to the content of this Wrap Fee Program Brochure.

Future Changes

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

At any time, you may view the current Disclosure Brochure (which includes this Wrap Fee Program Brochure) on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 282163. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (800) 834-2101.

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Item 4 – Services Fees and Compensation

A. Services

NewDay provides customized investment advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the NewDay Disclosure Brochure (Form ADV 2A). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting NewDay as your investment advisor.

As part of the investment advisory fees noted in Item 5 of the Disclosure Brochure, NewDay includes securities transaction fees (herein “Covered Costs”) as part of the overall investment advisory fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program”. The Advisor sponsors the NewDay Wrap Fee Program.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of securities transaction fees into the single “bundled” investment advisory fee. This Wrap Fee Program Brochure references back to the NewDay Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. **Please see Item 4 – Advisory Services of the Disclosure Brochure for details on NewDay’s investment philosophy and related services.**

B. Program Costs

Advisory services provided by NewDay are offered in a wrap fee structure whereby Covered Costs are included in the overall investment advisory fee paid to NewDay. As the level of trading in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the transactions costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on services to be provided to each Client, however, the Client is not charged more if there is higher trading activity in the Client’s account[s]. A Wrap Fee structure has a potential conflict of interest as the Advisor may have an incentive to limit the number of trades placed in the Client’s account[s]. The Advisor will only place Client assets into a Wrap Fee Program when it is believed to be in the Client’s best interest. **Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

C. Fees

Investment advisory fees are paid monthly, in advance of each calendar month, pursuant to the terms of the investment advisory agreement. Investment advisory fees are at an annual rate ranging from 0.75% to 1.25%. Fees are based on the market value of assets under management at the end of the prior calendar month.

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

As noted above, the Wrap Fee Program includes Covered Costs incurred in connection with the discretionary investment management services provided by NewDay. Securities transaction fees for Client-directed trades may be charged back to the Client.

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client’s account[s].

In addition, all fees paid to NewDay for investment advisory services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund’s prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. The Client may also incur other costs assessed by the Custodian or other parties for account related activity fees, such as wire transfer fees, fees for trades executed away from the Custodian, certificate delivery fees, markups and markdowns, bid-ask spreads,

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selling concessions, and other miscellaneous fees and expenses as outlined in the account opening paperwork executed with the Custodian, are generally charged to the Client. Clients are encouraged to refer to the account opening paperwork executed with the Custodian for an outline of all third party fees covered under this Wrap Fee Program. The Advisor does not control nor share in these fees. The Client should review both the fees charged by the fund[s] and the fees charged by NewDay to fully understand the total fees to be paid. Please see Item 5.C. – Other Fees and Expenses in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

D. Compensation

NewDay is the sponsor and portfolio manager of this Wrap Fee Program. NewDay receives investment advisory fees paid by Clients for participating in the Wrap Fee Program and pays the Covered Costs associated with the normal trading activity in the Client's account[s].

Item 5 – Account Requirements and Types of Clients

NewDay offers investment advisory services to individuals, high net worth individuals. NewDay generally does not impose a minimum size for establishing a relationship. **Please see Item 7 of the Disclosure Brochure for additional details.**

Item 6 – Portfolio Manager Selection and Evaluation

A. Portfolio Manager Selection

NewDay serves as sponsor and as portfolio manager for the services under this Wrap Fee Program. NewDay may also select unaffiliated investment advisors that have separate fee schedules and may incur securities transaction costs for investments in those accounts.

B. Related Persons

NewDay personnel serve as portfolio managers for all advisory accounts, including accounts under this Wrap Fee Program. NewDay does not serve as a portfolio manager for any third-party wrap fee programs.

C. Supervised Persons

NewDay Advisory Persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Program Brochure. Details of the advisory services provided are included in Item 4.A. of the Disclosure Brochure.

B. Methods of Analysis

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on the research and analysis methods employed by the Advisor.

Risk of Loss

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

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

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

Market Risks

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

ETF Risks

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

Mutual Fund Risks

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

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

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

Performance-Based Fees

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

Proxy Voting

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

Item 7 – Client Information Provided to Portfolio Managers

NewDay is the sponsor and sole portfolio manager for the Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the NewDay's Privacy Policy (included after this Wrap Fee Program Brochure).

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Item 8 – Client Contact with Portfolio Managers

NewDay is a full-service investment advisory firm. Clients always have direct access to the Portfolio Managers at NewDay.

Item 9 – Additional Information

A. Disciplinary Information and Other Financial Industry Activities and Affiliations

There are no legal, regulatory or disciplinary events involving NewDay or its owner. NewDay values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the client engages. The backgrounds of the Advisor and its Advisory Persons are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for the Advisor firm name or by CRD# 282163.

Please see Item 9 of the NewDay Disclosure Brochure as well as Item 3 of each Advisory Person's Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its Advisory Persons.

Other Financial Activities and Affiliations

Please see Items 10 and 14 of the NewDay Disclosure Brochure (included with this Wrap Fee Program Brochure).

B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information

NewDay has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to NewDay's compliance program ("Supervised Persons"). Complete details on the NewDay Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

Review of Accounts

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of NewDay under the supervision of the Chief Compliance Officer ("CCO"). Details of the review policies and practices are provided in Item 13 of the Disclosure Brochure.

Other Compensation

Please see Item 14 – Other Compensation in the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on additional compensation that may be received by NewDay or its Advisory Persons. Each Advisory Person's Brochure Supplement (also included with this Wrap Fee Program Brochure) provides details on any outside business activities and the associated compensation.

Participation in Institutional Advisor Platform

The Advisor has established an institutional relationship with Raymond James to assist the Advisor in managing Client account[s]. Access to the Raymond James Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Raymond James. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

During the initial start-up of the Advisor in 2016, Ms. Thomas received financial assistance and a commercial loan from Raymond James to assist the Advisor with the initial launch of its business and the transition of Client accounts to Raymond James. The transition assistance was paid to Ms. Thomas and required a five-year

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commitment to utilize Raymond James as its Custodian. The transition assistance was provided to assist with start-up expenses, reimbursement of client account transfer cost, technology and other aspects to assist Ms. Thomas with the launch of the Advisor. The terms of the agreement stipulate that If the Advisor transfers assets away from Raymond James prior to the end of the five-year period, a portion of the transition assistance may be required to repaid to Raymond James. The commercial loan provided to the Advisor had monthly payments of principal and interest for a five-year term, but no prepayment penalty. The loan has been repaid in full to Raymond James. Neither the Advisor nor Ms. Thomas has received any additional financial support.

Additionally, the Advisor may receive the following benefits from Raymond James: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

Client Referrals from Solicitors

NewDay does not engage paid solicitors for Client referrals.

Financial Information

Neither NewDay, nor its management has any adverse financial situations that would reasonably impair the ability of NewDay to meet all obligations to its Clients. Neither NewDay, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. NewDay is not required to deliver a balance sheet along with this Disclosure Brochure, as the firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in advance. Please see Item 18 of the Disclosure Brochure.

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Form ADV Part 2B – Brochure Supplement

for

**Kathleen M. Thomas, CIMA[®], CFP[®], CLU[®]
President, Lead Wealth Advisor**

Effective: March 24, 2020

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Kathleen M. Thomas (CRD# **2308400**) in addition to the information contained in the NewDay Solutions, LLC (“NewDay” or the “Advisor”) (CRD # 282163) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the NewDay Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (800) 834-2101.

Additional information about Ms. Thomas is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 2308400.

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Item 2 – Educational Background and Business Experience

Kathleen M. Thomas is the President, Lead Wealth Advisor and Chief Compliance Officer of NewDay. Ms. Thomas, born in 1963, is dedicated to advising Clients of NewDay. Ms. Thomas earned a B.A. in Political Science and Government in 1985 and a B.S. in Finance from Salem State University in 1987. Additional information regarding Ms. Thomas's employment history is included below.

Employment History:

President, Lead Wealth Advisor, NewDay Solutions, LLC	01/2016 to Present
Lead Wealth Advisor, Mid Atlantic Financial Management, Inc.	09/2019 to Present
Private Wealth Advisor, Ameriprise Financial Services, Inc.	12/1992 to 01/2015

Certified Investment Management AnalystSM (CIMA[®])

The CIMA[®] certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA[®] certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA[®] certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school, pass an online Certification Examination, and have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements. CIMA[®] designees are required to adhere to IMCA's *Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks*. CIMA[®] designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA).

The CIMA[®] certification has earned ANSI[®] (American National Standards Institute) accreditation under the personnel certification program. The American National Standards Institute, or ANSI, is a private non-profit organization that facilitates standardization and conformity assessment activities in the United States. CIMA[®] is the first financial services credential to meet this international standard for personnel certification.

Certified Financial Planner ("CFP[®]")

The CERTIFIED FINANCIAL PLANNER[™], CFP[®] and federally registered CFP[®] 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, administered in 10 hours over a two-day period, 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;

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- *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 Chartered Life Underwriter ("CLU®")

The Chartered Life Underwriter® ("CLU®") is a designation of insurance expertise, helping gain a significant advantage in a competitive market. This course of study helps by providing in-depth knowledge on the insurance needs of individuals, business owners and professional clients.

Program Learning Objectives

- Provide guidance to clients on types and amounts of life insurance needed
- Make recommendations on aspects of risk management, including personal and business uses of a variety of insurance solutions
- Provide guidance to clients on legal aspects of life insurance contracts and beneficiaries
- Assist clients in making decisions about estate planning, including proper holding of assets and title to assets, as well as the implications of various wills and trust arrangements on financial, retirement and succession planning issues
- Provide a holistic and comprehensive approach to addressing the insurance planning needs of their clients

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Thomas. Ms. Thomas has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Thomas.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Thomas.***

However, we do encourage you to independently view the background of Ms. Thomas on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 2308400.

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Item 4 – Other Business Activities

Insurance Agency Affiliations

Ms. Thomas is also a licensed insurance professional. Ms. Thomas maintains insurance licensing to assist Clients, but does not seek to earn additional compensation in the form of commissions. Ms. Thomas and NewDay may refer the Client to unaffiliated insurance professionals or firms, which will receive a commission for the implementation of recommendations. If Ms. Thomas or NewDay implements an insurance product for a Client, they will first seek products that do not pay a commission. If a commissionable product is deemed the best option for the Client and is implemented directly by NewDay or Ms. Thomas, they will seek to have commissions waived or rebated to the Client. If the commission cannot be waived or rebated, NewDay will coordinate with the Client to donate the commission to a charity, as allowable by law. Clients are under no obligation to implement any recommendations made the Advisor or Ms. Thomas.

Other Registered Investment Advisor Affiliation

Ms. Thomas is a Lead Wealth Advisor of Mid Atlantic Financial Management, Inc. ("Mid Atlantic") (CRD# 109771). As a Lead Wealth Advisor with Mid Atlantic, Ms. Thomas will receive investment advisory fees for investment management services offered. Ms. Thomas will provide each Client with Mid Atlantic's Form ADV 2A or equivalent disclosure brochure, in advance of providing investment management services. At no time will Ms. Thomas or the Advisor earn both ongoing investment advisory fees under the Advisor and ongoing investment advisory fees through Mid Atlantic on the same investment assets.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Ms. Thomas serves as the President, Lead Wealth Advisor and Chief Compliance Officer of NewDay. Ms. Thomas can be reached at (800) 834-2101.

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



Form ADV Part 2B – Brochure Supplement

for

Tammy L. Symons, CFP®
Wealth Advisor

Effective: March 24, 2020

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Tammy L. Symons (CRD# **4825121**) in addition to the information contained in the NewDay Solutions, LLC ("NewDay" or the "Advisor") (CRD # 282163) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the NewDay Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (800) 834-2101.

Additional information about Ms. Symons is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4825121.

Item 2 – Educational Background and Business Experience

Tammy L. Symons is the Wealth Advisor for NewDay. Ms. Symons, born in 1974, is dedicated to advising Clients of NewDay. Ms. Symons earned a B.S. in Business from Southern New Hampshire University in 2011 and an Associates Degree in Applied Science from Bay State College in 1994. Additional information regarding Ms. Symons's employment history is included below.

Employment History:

Wealth Advisor, NewDay Solutions, LLC	01/2016 to Present
Wealth Advisor, Mid Atlantic Financial Management, Inc.	09/2019 to Present
Financial Advisor, Thomas and Associates	08/2011 to 01/2016
Paraplanner, Amirault, Thompson and Associates	09/2007 to 08/2011
Paraplanner, Beverly Millard	09/2006 to 07/2007
Financial Advisor, Ameriprise Financial	07/2004 to 09/2006

Certified Financial Planner ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® 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, administered in 10 hours over a two-day period, 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

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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.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Symons. Ms. Symons has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Symons.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Symons.***

However, we do encourage you to independently view the background of Ms. Symons on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4825121.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Ms. Symons is also a licensed insurance professional. Ms. Symons maintains insurance licensing to assist Clients, but does not seek to earn additional compensation in the form of commissions. Ms. Symons and NewDay may refer the Client to unaffiliated insurance professionals or firms, which will receive a commission for the implementation of recommendations. If Ms. Symons or NewDay implements an insurance product for a Client, they will first seek products that do not pay a commission. If a commissionable product is deemed the best option for the Client and is implemented directly by NewDay or Ms. Symons, they will seek to have commissions waived or rebated to the Client. If the commission cannot be waived or rebated, NewDay will coordinate with the Client to donate the commission to a charity, as allowable by law. Clients are under no obligation to implement any recommendations made the Advisor or Ms. Symons.

Other Registered Investment Advisor Affiliation

Ms. Symons is a Wealth Advisor of Mid Atlantic Financial Management, Inc. ("Mid Atlantic") (CRD# 109771). As a Wealth Advisor with Mid Atlantic, Ms. Symons will receive investment advisory fees for investment management services offered. Ms. Symons will provide each Client with Mid Atlantic's Form ADV 2A or equivalent disclosure brochure, in advance of providing investment management services. At no time will Ms. Symons or the Advisor earn both ongoing investment advisory fees under the Advisor and ongoing investment advisory fees through Mid Atlantic on the same investment assets.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Ms. Symons serves as a Wealth Advisor of NewDay and is supervised by Kathleen Thomas, the Chief Compliance Officer. Ms. Thomas can be reached at (800) 834-2101.

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



Form ADV Part 2B – Brochure Supplement

for

Stephen A. Coopersmith, CFP[®], CIMA[®]
Portfolio Analyst

Effective: March 24, 2020

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Stephen A. Coopersmith (CRD# **6164631**) in addition to the information contained in the NewDay Solutions, LLC (“NewDay” or the “Advisor”) (CRD # 282163) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the NewDay Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (800) 834-2101.

Additional information about Mr. Coopersmith is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6164631.

Item 2 – Educational Background and Business Experience

Stephen A. Coopersmith, CFP®, CIMA®, is a Portfolio Analyst for NewDay. Mr. Coopersmith, born in 1989, is dedicated to advising Clients of NewDay. Mr. Coopersmith earned a Bachelor's Degree in Finance and Accounting from Saint Joseph's College in 2011. Additional information regarding Mr. Coopersmith's employment history is included below.

Employment History:

Portfolio Analyst, NewDay Solutions, LLC	01/2016 to Present
Financial Advisor, Mid Atlantic Financial Management, Inc.	09/2019 to Present
Paraplanner, Thomas & Associates	02/2013 to 01/2016
Research Analyst, NewDay Asset Management Solutions LLC	02/2014 to 12/2015
Accounting Clerk, Norton Insurance and Financial Services	06/2011 to 01/2013
Grounds Keeper, Wawenock Golf Course (For Summer Months Only)	06/2008 to 06/2010
Tax Preparer, Cross Professional Associates (Winter Internship)	01/2010 to 04/2010

Certified Financial Planner ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® 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, administered in 10 hours over a two-day period, 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.

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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

Certified Investment Management AnalystSM (CIMA®)

The CIMA certification signifies that an individual has met initial and ongoing experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. To earn CIMA® certification, candidates must: submit an application; pass a background check and have an acceptable regulatory history; pass an online Qualification Examination; complete an in-person or online executive education program at an AACSB accredited university business school; pass an online Certification Examination; and have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements and have three years of financial services experience at the time of certification.

CIMA® certificants must adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA).

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Coopersmith. Mr. Coopersmith has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Coopersmith.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Coopersmith.***

However, we do encourage you to independently view the background of Mr. Coopersmith on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6164631.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Coopersmith is also a licensed insurance professional. Mr. Coopersmith maintains insurance licensing to assist Clients, but does not seek to earn additional compensation in the form of commissions. Mr. Coopersmith and NewDay may refer the Client to unaffiliated insurance professionals or firms, which will receive a commission for the implementation of recommendations. If Mr. Coopersmith or NewDay implements an insurance product for a Client, they will first seek products that do not pay a commission. If a commissionable product is deemed the best option for the Client and is implemented directly by NewDay or Mr. Coopersmith, they will seek to have commissions waived or rebated to the Client. If the commission cannot be waived or rebated, NewDay will coordinate with the Client to donate the commission to a charity, as allowable by law. Clients are under no obligation to implement any recommendations made the Advisor or Mr. Coopersmith.

Other Registered Investment Advisor Affiliation

Mr. Coopersmith is a Financial Advisor of Mid Atlantic Financial Management, Inc. ("Mid Atlantic") (CRD# 109771). As a Financial Advisor with Mid Atlantic, Mr. Coopersmith will receive investment advisory fees for investment management services offered. Mr. Coopersmith will provide each Client with Mid Atlantic's Form ADV 2A or equivalent disclosure brochure, in advance of providing investment management services. At no time will Mr. Coopersmith or the Advisor earn both ongoing investment advisory fees under the Advisor and ongoing investment advisory fees through Mid Atlantic on the same investment assets.

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Item 5 – Additional Compensation

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

Item 6 – Supervision

Mr. Coopersmith serves as a Portfolio Analyst of NewDay and is supervised by Kathleen Thomas, the Chief Compliance Officer. Kathleen Thomas can be reached at (800) 834-2101.

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

Form ADV Part 2B – Brochure Supplement

for

**Joseph T. Neff
Financial Planner**

Effective: March 24, 2020

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Joseph T. Neff (CRD# 7047011) in addition to the information contained in the NewDay Solutions, LLC (“NewDay” or the “Advisor”, CRD# 282163) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the NewDay Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (800) 834-2101.

Additional information about Mr. Neff is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7047011.

Item 2 – Educational Background and Business Experience

Joseph T. Neff, born in 1992, is dedicated to advising Clients of NewDay as a Financial Planner. Mr. Neff also earned a Bachelor of Arts in Economics from Grove City College in 2015. Additional information regarding Mr. Neff's employment history is included below.

Employment History:

Financial Planner, NewDay Solutions, LLC	01/2017 to Present
Financial Advisor, Mid Atlantic Financial Management, Inc.	09/2019 to Present
Instructor, Renzo Gracie NH	09/2017 to 07/2018
Business Analyst, Northeastern Fence	05/2015 to 01/2017

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Neff. Mr. Neff has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Neff.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Neff.***

However, we do encourage you to independently view the background of Mr. Neff on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7047011.

Item 4 – Other Business Activities

Other Registered Investment Advisor Affiliation

Mr. Neff is also a Financial Advisor of Mid Atlantic Financial Management, Inc. ("Mid Atlantic") (CRD# 109771). As a Financial Advisor with Mid Atlantic, Mr. Neff will receive investment advisory fees for investment management services offered. Mr. Neff will provide each Client with Mid Atlantic's Form ADV 2A or equivalent disclosure brochure, in advance of providing investment management services. At no time will Mr. Neff or the Advisor earn both ongoing investment advisory fees under the Advisor and ongoing investment advisory fees through Mid Atlantic on the same investment assets.

Item 5 – Additional Compensation

Mr. Neff has an additional business activity where compensation is received that is detailed in Item 4 above.

Item 6 – Supervision

Mr. Neff serves as a Financial Planner of NewDay and is supervised by Kathleen Thomas, the Chief Compliance Officer. Ms. Thomas can be reached at (800) 834-2101.

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

NewDay Solutions, LLC

1 Park Ave, Suite 4, Hampton, NH 03842-2113

Phone: (800) 834-2101

<http://NewDaySolutions.com>

Privacy Policy

Effective Date: March 24, 2020

Our Commitment to You

NewDay Solutions, LLC ("NewDay" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. NewDay (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

NewDay does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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<http://NewDaySolutions.com>

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes NewDay does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where NewDay or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients NewDay does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

Massachusetts	In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (800) 834-2101.