

Prosperity Road, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: May 12, 2020

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Prosperity Road, LLC (“Prosperity Road” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (714) 241-0212 or by email at emily@prosperityroadllc.com.

Prosperity Road is a registered investment advisor located 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 Prosperity Road to assist you in determining whether to retain the Advisor.

Additional information about Prosperity Road 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# 281894.

Prosperity Road, LLC
120 W. 5th Street, Suite 220, Santa Ana, CA 92701
Phone: (714) 241-0212 Fax: (714) 241-0213
<http://prosperityroadllc.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 the Advisory Persons of Prosperity Road. For convenience, the Advisor has combined these documents into a single disclosure document.

Prosperity Road 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. Prosperity Road encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor is in the process of transitioning from registration with the State of California to registration with the U.S. Securities and Exchange Commission ("SEC"), due to the level of assets under management. Please see Item 4.

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 Prosperity Road.

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# 281894. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (714) 241-0212 or by email at emily@prosperityroadllc.com.

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Item 4 – Advisory Services

A. Firm Information

Prosperity Road, LLC (“Prosperity Road” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of California. Prosperity Road was founded in October 2015. Prosperity Road is primarily owned by E4 Vantage, LLC, a holding company registered as an LLC in California. Prosperity Road is operated by Emily T. Hermeno (Principal and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Prosperity Road.

B. Advisory Services Offered

Prosperity Road offers investment advisory services to individuals, high net worth individuals, trusts, estates, retirement plans, charitable organizations and corporations (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the 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. Prosperity Road’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.

Wealth Management Services

Prosperity Road provides customized wealth advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and financial planning services. Prosperity Road works closely with each Client to identify their investment goals and objectives, as well as risk tolerance and financial situation in order to create a investment strategy. Prosperity Road will develop an asset allocation strategy based on the Client’s unique situation and then construct a portfolio primarily consisting of no-load mutual funds. The Advisor may also utilize exchange-traded funds (“ETFs”), individual stocks, individual bonds and other types of investments, as appropriate, to meet the needs of its Clients. The Advisor typically constructs portfolios using institutional mutual funds through Dimensional Funds Advisors (“DFA”) to creating a Client’s portfolio. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Prosperity Road’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Prosperity Road 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.

Prosperity Road evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Prosperity Road may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Prosperity Road 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. Prosperity Road 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 the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Prosperity Road 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 terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

Use of Independent Managers

Prosperity Road will recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Manager”) for all or a portion of a Client’s investment portfolio, based on the Client’s needs and objectives. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with its Clients investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client will be provided with the Independent Manager’s Form ADV Part 2A – Disclosure Brochure (or a brochure that makes the appropriate disclosures).

Prosperity Road may recommend BAM Advisor Services, LLC (“BAM” or the “Investment Platform”), if appropriate. The Client will then enter into one or more agreements with BAM to authorize discretionary investment management.

Financial Planning Services

Prosperity Road will typically provide a variety of financial planning services to Clients, pursuant to a written financial planning agreement. 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, 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.

Prosperity Road may also refer Clients to an accountant, attorney or another 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 (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting 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 through the Advisor.

Retirement Plan Advisory Services

Prosperity Road provides retirement plan advisory services on behalf of the retirement plans (each a “Plan”) and the company (the “Plan Sponsor”). The Advisor’s retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement (“IPS”) Design and Monitoring
- Investment Oversight Services (ERISA 3(21))
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance

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These services are provided by Prosperity Road serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Prosperity Road's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

C. Client Account Management

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

D. Wrap Fee Programs

Prosperity Road does not manage or place Client assets into a wrap fee program. Investment advisory services are provided directly by Prosperity Road.

E. Assets Under Management

As of December 31, 2019, Prosperity Road manages \$117,063,468 in Client assets, \$114,174,053 of which are managed on a discretionary basis and \$2,889,415 on a non-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 engaging the Advisor for services described herein shall be required to enter into one or more agreements with the Advisor.

A. Fees for Advisory Services

Wealth Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter.

Investment advisory fees are based on the following schedule:

Assets Under Management	Annual Rate
Up to \$999,999	1.25%
\$1,000,000 to \$1,999,999	1.00%
\$2,000,000 to \$2,999,999	0.90%
\$3,000,000 to \$4,999,999	0.80%
\$5,000,000 to \$7,499,999	0.70%
\$7,500,000 to \$9,999,999	0.60%
\$10,000,000 to \$14,999,999	0.50%
\$15,000,000 to \$19,999,999	0.45%
\$20,000,000 to \$24,999,999	0.40%
\$25,000,000 to \$49,999,999	0.35%
\$50,000,000 or more	0.30%

* The Advisor imposes a minimum fee of \$3,500 which can be waived at the sole discretion of the Advisor.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. 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 Prosperity Road will be independently valued by the designated Custodian. Prosperity Road will not have the authority or responsibility to value portfolio securities. Prosperity Road may utilize pricing from a Custodian, other than a Client's primary Custodian for various reporting purposes.

The Advisor's fee is exclusive of, and in addition to, any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5C. below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Use of Independent Managers

Fees for Clients participating in an Investment Platform are included in Prosperity Road's investment advisory fee as noted above

Financial Planning Services

Prosperity Road offers financial planning services either on an hourly basis or for a fixed fee. Hourly fees range from \$200 to \$300. Fixed fees are based on the expected number of hours to complete the engagement at the negotiated hourly rate. Fees may be negotiable based on the on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

The Advisor imposes a minimum fee of \$2,000 which can be waived at the sole discretion of the Advisor.

Retirement Plan Advisory Services

Retirement plan advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Retirement plan advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Fees may be negotiable depending on the size and complexity of the Plan. Prosperity Road will pay BAM service a fee, based on management fees paid to the Advisor, the retirement plan advisory fees are based on the fee schedule:

Assets Under Management	BAM's Annual Fee	Prosperity Road's Annual Fee	Total Fee
On the first \$1,000,000	0.20%	0.70%	0.90%
On the next \$4,000,000	0.15%	0.45%	0.60%
On the next \$5,000,000	0.075%	0.25%	0.325%
Over \$10,000,000	0.05%	0.15%	0.20%

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The Advisor imposes a minimum fee of \$3,000 which can be waived at the sole discretion of the Advisor.

B. Fee Billing

Wealth Management Services

Investment advisory fees are 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 quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Prosperity Road at the end of the prior calendar quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Prosperity Road and 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.

Use of Independent Managers

Fees for Clients participating in an Investment Platform are included in Prosperity Road's investment advisory fee described above. Prosperity Road will provide the Investment Platform with their respective portion of the advisory fee.

Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement, with the remaining balance upon receipt of the agreed upon deliverable[s].

Retirement Plan Advisory Services

Fees may be deducted from the accounts of the Plan Participants or paid by the Plan Sponsor.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Prosperity Road, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, if applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by Prosperity Road are separate and distinct from these custody and execution fees.

In addition, all fees paid to Prosperity Road for investment advisory services 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 Prosperity Road, but would not receive the services provided by Prosperity Road 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 Prosperity Road 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

Wealth Management Services

Prosperity Road is compensated for its wealth management services in advance of the calendar quarter in which investment advisory services are rendered. Either party may terminate the agreement by providing thirty (30) days advance written notice to the other party. The Client may also terminate the investment advisory agreement within

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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 investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Independent Managers

In the event that a Client should wish to terminate their relationship with the Investment Platform and any Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and those third parties. Prosperity Road will assist the Client with the termination and transition as appropriate.

Financial Planning Services

Prosperity Road is partially compensated in advance for financial planning services. Either party may terminate the agreement by providing thirty (30) days advance written notice to the other party. In addition, the Client may also terminate the agreement within five (5) business days of signing the Advisor's financial planning 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 Advisor will refund any unearned, prepaid financial planning fees to the Client. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

Retirement Plan Advisory Services

Prosperity Road is compensated for its retirement plan advisory services in advance of the calendar quarter in which investment advisory services are rendered. Either party may terminate the agreement by providing thirty (30) days advance written notice to the other party. The Client may also terminate the retirement plan advisory services 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 retirement plan advisory fees to the Client. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

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

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

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

Prosperity Road 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

Prosperity Road offers investment advisory services individuals, high net worth individuals, trusts, estates, retirement plans, charitable organizations and corporations. The amount of each type of Client is available on Prosperity Road's Form ADV Part 1. These amounts may change over time and are updated at least annually by the Advisor. Prosperity Road generally requires a minimum account size of \$500,000 to effectively implement its investment process. For Clients that do not meet the minimum account size, the Advisor generally imposes an annual minimum fee.

Prosperity Road also has a separate minimum account size of \$400,000 that is generally required for management services of individual fixed income securities. These minimum account sizes and minimum fees may be negotiable at the sole discretion of the Advisor depending on certain circumstances.

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

A. Methods of Analysis

Prosperity Road primarily employs fundamental analysis in developing investment strategies for its Clients. Research and analysis from Prosperity Road are 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 generally consist of 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 a 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, Prosperity Road generally employs a long-term investment approach for its Clients, as consistent with their financial goals. Prosperity Road 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, Prosperity Road 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. Prosperity Road 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.

While the methods of analysis help 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 these methods of 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.

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 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.

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.

Mutual Fund Risks

The performance of mutual funds is subject to market risks, 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.

ETF Risks

The performance of ETFs is subject to market risks, 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 have 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.

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 Prosperity Road or Ms. Hermeno.

Prosperity Road 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# 281894.

Item 10 – Other Financial Industry Activities and Affiliations

Accounting Firm

Ms. Hermeno is also a Manager at the accounting firm Financial Advocates, Inc. ("Financial Advocates"). Prosperity Road may recommend Financial Advocates to Clients in need of accounting and tax services. Such services are separate and distinct from the advisory services offered by Prosperity Road. Clients of the Advisor are not required to use the services provided by Financial Advocates. In her role with Financial Advocates, Ms. Hermeno does not have the authority to sign checks or otherwise disburse funds on any Client's behalf. Ms. Hermeno devotes approximately 10 hours per month on her duties with Financial Advocates.

Use of Independent Manager

The Advisor has contracted with BAM for services including trade processing, collection of management fees, record maintenance, report preparation, marketing assistance, and research. Prosperity Road has also contracted with BAM for sub-advisory services with respect to Clients' fixed income accounts. The Advisor pays a fee for BAM's services based on management fees paid to Prosperity Road on Client account[s] that use BAM. The fee paid by the Advisor to BAM consists of a portion of the fee paid by Clients to Advisor and varies based on the total Client assets administered by BAM through Advisor. These fees are not separately charged to advisory Client[s]. For investment management and employee benefit plan services, the Advisor will request authority from the Client to receive quarterly payments directly from the Client's account[s] held by an independent custodian. Clients may provide written limited authorization to Advisor or its designated service provider, BAM, to withdraw fees from the account. Clients will receive custodial statements showing the advisory fees debited from their account(s). Certain third party administrators will calculate and debit the Advisor's fee and remit such fee to Advisor.

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Licensed Attorney

Ms. Hermeno is also a licensed attorney with the State of California. Ms. Hermeno maintains this licensing, but does not provide legal services to Clients or non-clients at this time.

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

A. Code of Ethics

Prosperity Road 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 Prosperity Road ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Prosperity Road and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Prosperity Road associates 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 (714) 241-0212.

B. Personal Trading with Material Interest

Prosperity Road allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Prosperity Road 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. Prosperity Road does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Prosperity Road 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 a Code, which addresses insider trading (material, non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Prosperity Road 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 Prosperity Road requiring reporting of personal securities trades by its employees for review by the employee's supervisor or the 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 Prosperity Road 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 Prosperity Road, or any Supervised Person of Prosperity Road, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Prosperity Road 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 Prosperity Road to direct trades to the Custodian as agreed upon in the investment advisory agreement. Furthermore, Prosperity Road does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

While Prosperity Road does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] 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 broker-dealer/custodian not recommended by Prosperity Road. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Prosperity Road may recommend the Custodian

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based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian's offices.

Prosperity Road will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab") or Fidelity Clearing & Custody Solution and related entities of Fidelity Investments, Inc. (collectively "Fidelity"). Schwab and Fidelity will serve as the Client's "qualified custodians" (herein the "Custodians"). Prosperity Road maintains an institutional relationship with the Custodians, whereby the Advisor receives economic benefits from the Custodians. 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. Prosperity Road does not participate in soft dollar programs sponsored or offered by the Custodians but may receive other economic benefits. Please see Item 14 below.

2. Brokerage Referrals – Prosperity Road 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 Prosperity Road will place trades within the established account[s] at the Custodian designated by the Client. Furthermore, all Client accounts are traded within their respective account[s]. 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]). Prosperity Road will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs, which are determined by the Custodian. 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. Prosperity Road will execute its transactions through the Custodian as directed by the Client.

Prosperity Road 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 any particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client's account[s] are monitored on a regular and continuous basis by Ms. Hermeno, Principal and Chief Compliance Officer of Prosperity Road. 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 13A. above, each Client account shall be reviewed at least annually. Reviews may be conducted more 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 Prosperity Road 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.

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 Prosperity Road

Prosperity Road is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. Prosperity Road does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Prosperity Road may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Prosperity Road may receive referrals of new Clients from a third-party.

Participation in Institutional Advisor Platform

Prosperity Road has established institutional relationships with the Custodians through their respective institutional advisor platforms. As a registered investment advisor participating in an institutional advisor platform, Prosperity Road receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at these Custodians. Services provided by the Custodians benefit the Advisor and many, but not all services provided by the Custodians will benefit Clients. 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 the Custodians creates a 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.

Services that Benefit the Client – The Custodians' institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through the Custodians, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Furthermore, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – The Custodians provide participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationships with the Custodians. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – The Custodians also offer other services and support to Prosperity Road that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend one of the Custodians, which results in a conflict of interest. Prosperity Road believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Client Referrals from Solicitors

Prosperity Road does not engage paid solicitors for Client referrals.

Item 15 – Custody

Prosperity Road 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 Prosperity Road to utilize the Custodian for the Client's security transactions. In connection with the deduction of the Advisor's fee, Prosperity Road will provide

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the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. Prosperity Road encourages Clients to review statements provided by the account Custodian. For more information about Custodians and brokerage practices, see Item 12 – Brokerage Practices.

Item 16 – Investment Discretion

Prosperity Road 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 Prosperity Road. 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 Prosperity Road will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Prosperity Road 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 Prosperity Road, nor its management, have any adverse financial situations that would reasonably impair the ability of Prosperity Road to meet all obligations to its Clients. Neither Prosperity Road, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Prosperity Road is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six (6) months or more in the future.

Form ADV Part 2B – Brochure Supplement

for

Emily T. Hermeno, JD, CFP®
Principal and Chief Compliance Officer

Effective: May 12, 2020

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Emily T. Hermeno (CRD# **4868466**) in addition to the information contained in the Prosperity Road, LLC (“Prosperity Road” or the “Advisor”) (CRD # 281894) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Prosperity Road Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (714) 241-0212 or by email at emily@prosperityroadllc.com.

Additional information about Ms. Hermeno is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Emily T. Hermeno, born in 1976, is dedicated to advising Clients of Prosperity Road in her role as the Principal and Chief Compliance Officer. Ms. Hermeno earned her Juris Doctor from the University of Southern California, Gould School of Law in 2002 and earned her Bachelor of Science in Economics and International Studies from the University of California, Los Angeles in 1999. Additional information regarding Ms. Hermeno's employment history is included below.

Employment History:

Principal and Chief Compliance Officer, Prosperity Road, LLC	10/2015 to Present
Accounting Manager, Financial Advocates, Inc.	04/2006 to Present
Wealth Manager, Financial Advocates LLC	04/2006 to 12/2017
Financial Analyst, The Ayco Company, a Goldman Sachs Company	07/2004 to 03/2006

About the CFP® Designation

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

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

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

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, 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.

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.

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Item 3 – Disciplinary Information

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. Hermeno.** However, the Advisor does encourage you to independently view the background of Ms. Hermeno on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or by her Individual CRD# 4868466.

Item 4 – Other Business Activities

Accounting Firm

Ms. Hermeno is also a Manager at the accounting firm Financial Advocates, Inc. (“Financial Advocates”). Prosperity Road may recommend Financial Advocates to Clients in need of accounting and tax services. Such services are separate and distinct from the advisory services offered by Prosperity Road. Clients of the Advisor are not required to use the services provided by Financial Advocates. In her role with Financial Advocates, Ms. Hermeno does not have the authority to sign checks or otherwise disburse funds on any Client’s behalf. Ms. Hermeno devotes approximately 10 hours per month on her duties with Financial Advocates.

Charitable Work

Ms. Hermeno also serves as the Chief Financial Officer (“CFO”) of Mommy & Me Cancer Foundation (“MMCF”), a 501(c)(3) non-profit organization. Ms. Hermeno may spend up to ten (10) hours per month supporting this organization. Ms. Hermeno does not receive any compensation from MMCF.

Licensed Attorney

Ms. Hermeno is also a licensed attorney with the State of California. Ms. Hermeno maintains this licensing, but does not provide legal services to Clients or non-clients at this time.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Ms. Hermeno serves as the Principal and Chief Compliance Officer of Prosperity Road. Ms. Hermeno can be reached at (714) 241-0212.

Prosperity Road has implemented a Code of Ethics, and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Prosperity Road. Furthermore, Prosperity Road is subject to regulatory oversight by various agencies. These agencies require registration by Prosperity Road and its Supervised Persons. As a registered entity, Prosperity Road is subject to examinations by regulators, which may be announced or unannounced. Prosperity Road 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.

Privacy Policy

Effective Date: May 12, 2020

Our Commitment to You

Prosperity Road, LLC ("Prosperity Road" 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. Prosperity Road (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.

Prosperity Road 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.

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 Prosperity Road 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 Prosperity Road 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 Prosperity Road 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

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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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 (714) 241-0212 or via email at emily@prosperityroadllc.com.