



## **Braun-Bostich & Associates, Inc.**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: November 14, 2023**

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Braun-Bostich & Associates, Inc. ("BBA" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (724) 942-2639.

BBA 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 about BBA to assist you in determining whether to retain the Advisor.

Additional information about BBA and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 288336.

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## **Item 2 – Material Changes**

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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 BBA. For convenience, the Advisor combined these documents into a single disclosure document.

BBA 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. BBA 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 change has been made to this Disclosure Brochure since the last filing and distribution to Clients:

- Due to the merger of TD Ameritrade, Inc. and Charles Schwab & Co., Inc., the Advisor has established an institutional relationship with Charles Schwab & Co., Inc. Please see Items 12 and 14 for additional information.
- The Advisor no longer charges a technology fee.
- The Advisor amended its fees for both its investment management and financial planning services. Please see Item 5A for additional details.

### **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.

You may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 288336. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (724) 942-2639.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Braun-Bostich & Associates, Inc. (“BBA” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). BBA is organized as a Corporation under the laws of the Commonwealth of Pennsylvania. BBA was founded in February 2002 and is owned and operated by Amy Braun-Bostich (Chief Executive Officer, Private Wealth Advisor, and the majority owner) and Cassandra Kirby (Chief Operating Officer, Chief Compliance Officer, and Private Wealth Advisor). This Disclosure Brochure provides information regarding the qualifications, business practices, and advisory services provided by BBA.

### **B. Advisory Services Offered**

BBA offers investment advisory services to individuals, high-net-worth individuals, trusts, estates, retirement plans, and charitable organizations (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 toward each Client and seeks to mitigate potential conflicts of interest. BBA’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 Management Services

BBA provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. BBA 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 portfolio strategy. BBA will then construct an investment portfolio consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds, or options contracts to meet the needs of its Clients. In certain circumstances, the Advisor may recommend real estate investment trusts (“REITs”) if these types of investments meet the goals, objectives, circumstances, and risk tolerance agreed to by the Client. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

BBA’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. BBA 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.

BBA evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. BBA may recommend, on occasion, redistributing investment allocations to diversify the portfolio. BBA 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. BBA 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 BBA 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 investment advisory agreement. For additional information, please see Item 12 – Brokerage Practices.

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client’s best interest, the Advisor will provide investment advice to the Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction, including rollovers from one ERISA-sponsored Plan to

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another, one IRA to another IRA, or from one type of account to another account (e.g., commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor earns a new (or increases its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

#### Use of Independent Managers

BBA will primarily recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio, based on the Client's needs and objectives. In such instances, the Client will be required to authorize and enter into an investment management agreement with an Independent Manager that defines the terms in which the Independent Manager will provide its services. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with the Client's investment objectives and overall best interests. The Advisor may 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) prior to entering into an agreement with an Independent Manager.

Vise Platform- The Advisor has engaged Vise as a platform provider and subadvisor to assist with managing certain clients' investment portfolios. The Advisor maintains discretionary authority to hire and fire Vise. Vise employs automated asset allocation, portfolio analysis, tax management, portfolio rebalancing, and portfolio selection strategies for intermediaries, including the Advisor.

As part of the service, the Advisor is granted access to Vise's secure website as a tool to monitor and manage client assets. The Advisor uses Vise's online platform to create and manage a desired investment strategy for clients. Among other features, Vise's platform allows the Advisor to customize how much exposure to take with respect to specific factors (known as an "active tilt") such as value, dividend, and size. Vise bases its advice on client investment objectives, restrictions, and preferences, as provided by the Advisor and in accordance with the agreements the Advisor has entered with Vise.

Clients do not have direct access to the Vise platform, and the Advisor is responsible for the management of the client's assets on the Vise platform. Clients must notify the Advisor of any specific stocks or securities in which the client is prohibited from investing, and the Advisor, in turn, is responsible for notifying Vise.

For its services, Vise will charge an asset-based fee that is in addition to the Advisor's fee. Vise's fee includes the securities transaction fees for all trades. The Advisor will only receive its investment advisory fees as detailed in Item 5.A. below and does not share in any fees earned by Vise.

#### Financial Planning Services

BBA provides a variety of financial planning and consulting services to Clients pursuant to a written financial planning agreement. Services may cover several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve creating a solution-focused approach to financial planning designed to allow the Client to make an informed decision about investment planning, retirement planning, personal savings, education savings, and other areas of a Client's financial situation.

A financial plan developed for 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, and establish education savings and/or charitable giving programs.

BBA may also refer Clients to an accountant, attorney, or other specialists as appropriate for their unique situation. For ongoing financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary.

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 through the Advisor.

#### Retirement Plan Advisory Services

BBA 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:

- Investment Oversight Services (ERISA 3(21))
- Ongoing Investment Recommendations and Assistance

These services are provided by BBA serving in the capacity of 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 BBA’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 BBA to provide investment advisory services, each Client is required to enter into one or more written 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 – BBA, in connection with the Client, will develop a strategy that seeks to achieve the Client’s investment goals and objectives.
- Asset Allocation – BBA will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk for each Client.
- Portfolio Construction – BBA will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – BBA will provide investment management and ongoing oversight of the Client’s relationship’s investment portfolio.

#### **D. Wrap Fee Programs**

BBA does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by BBA.

#### **E. Assets Under Management**

As of December 31, 2022, the Advisor manages \$181,251,620 in Client assets, of which \$178,462,111 are managed on a discretionary basis and \$2,789,509 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

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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 written agreements with the Advisor.

#### **A. Fees for Advisory Services**

##### Investment 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 average daily balance in the account ending on the last day of the prior calendar quarter. Investment advisory fees are offered at an annual rate that

ranges between 0.25% and 1.50% or a tiered schedule that does not exceed 1.50%. The Advisor generally charges a minimum annual fee of \$5,000, which may be negotiable at the sole discretion of the Advisor. Fees are based on several factors, including the complexity of the services to be provided, the level of assets to be managed, 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. Certain legacy clients may be subject to fees that differ from the above.

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 BBA will be independently valued by the Custodian. BBA will conduct periodic reviews of the Custodian's valuations.

#### Use of Independent Managers

As noted in Item 4, the Advisor will implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule that will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager.

Vise Platform- Advisory fees charged by Vise are separate and apart from the Advisor's advisory fees. Assets managed by Vise will be included in calculating our advisory fee, which is based on the fee schedule set forth in Item 5 of this brochure. Advisory fees that you pay to Vise are negotiated between the Advisor and Vise and are up to 0.50% of the assets managed on the Vise platform.

#### Financial Planning Services

*Ongoing Annual Review* – BBA offers financial planning services for an annual fixed engagement fee ranging from \$1,000 to \$20,000. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. Clients receiving tax-planning services will be charged a higher fee. Financial planning fees are deducted from a Client's designated account quarterly (annual fee divided by 4) in advance of services being provided. The financial planning fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter.

*Project-Based Planning* – BBA offers financial planning services for a fixed fee ranging from \$2,000 to \$10,000. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total costs will be determined and provided to the Client prior to establishing the advisory relationship.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of 0.75% and are billed at the end of each month, 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 each month. Fees may be negotiable depending on the size and complexity of the Plan.

### **B. Fee Billing**

#### Investment 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 beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the average daily balance of the total assets under management with BBA at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting the 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 BBA to

be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees may include BBA's investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager[s], as applicable. In certain instances, the Independent Manager or the Advisor may assume responsibility for calculating the Client's fees and deduct all fees from the Client's account[s].

#### Financial Planning Services

Financial planning fees for project-based planning may be invoiced up to one hundred percent (100%) of the expected total fee upon execution of the financial planning agreement. Financial planning fees for ongoing annual reviews are invoiced by the Advisor at the beginning of each quarter. The Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

#### Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than BBA, 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, as 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 BBA are separate and distinct from these custody and execution fees.

In addition, all fees paid to BBA 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 could invest in these products directly, without the services of BBA, but would not receive the services provided by BBA, 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 BBA 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 Management Services

BBA is compensated for its investment advisory services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement by providing advance written notice to the other party. In addition, 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 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.

#### Use of Independent Managers

In the event that the Client should wish to terminate their relationship with the Independent Manager, the terms for the termination will be set forth in the respective agreements between the Client and the Independent Manager. BBA will assist the Client with the termination and transition as appropriate.

### Financial Planning Services

BBA is compensated for its financial planning services before services are rendered. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. In addition, 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 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 planning fees based on the number of days from the effective date of termination to the end of the quarter. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

### Retirement Plan Advisory Services

BBA is compensated for its retirement plan advisory services at the end of the month after services are rendered. Either party may terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

### **E. Compensation for Sales of Securities**

BBA 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.

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

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

BBA offers investment advisory services to individuals, high-net-worth individuals, trusts, estates, retirement plans, and charitable organizations. 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. BBA generally does not impose a minimum account size for establishing a relationship; however, the Advisor generally charges a minimum annual fee of \$5,000, which may be negotiable at the sole discretion of the Advisor.

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

### **A. Methods of Analysis**

BBA employs fundamental and cyclical analysis in developing investment strategies for its Clients. Research and analysis from BBA are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and reviews 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.

*Cyclical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Cyclical analysis may involve the use of charts to identify market patterns and

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trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future.

As noted above, BBA generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. BBA 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, BBA 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. BBA 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 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.

The risks associated with a particular strategy are provided to each Client in advance of investing Client's 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.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The value of the ETFs will fluctuate with the value 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 volume. Authorized participants in an ETF may change at any time; this may result in changes to the liquidity and the ability to redeem the ETF, as the authorized participants control the number of shares of the ETF. The value of an ETF fluctuates based upon the market movements and may disassociate from the index being tracked or from the value of the underlying investments. An ETF purchased or sold at one point in the day may have a different value than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

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

### Real Estate Investment Trusts

Investing in Real Estate Investment Trusts involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. Equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers, and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

**Past performance is not a guarantee of future returns. Investing in securities and other investments involves 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 BBA or its management persons.** BBA 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](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 288336.

## Item 10 – Other Financial Industry Activities and Affiliations

The sole business of BBA is to provide investment advisory services to its Clients. Neither BBA nor its Advisory Persons are involved in other business endeavors. BBA does not maintain any affiliations with other firms, other than contracted service providers, to assist with the servicing of its Client's accounts.

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

### **A. Code of Ethics**

BBA 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 BBA ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. BBA and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of BBA's 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 (724) 942-2639.

### **B. Personal Trading with Material Interest**

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

### **C. Personal Trading in Same Securities as Clients**

BBA 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 the Code to address insider trading (material, nonpublic information controls), gifts and entertainment, outside business activities, and personal securities reporting. When trading for personal accounts, Supervised Persons 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, nonpublic information. This risk is mitigated by BBA requiring reporting of personal securities trades by its Supervised Persons for review by the

Chief Compliance Officer (“CCO”) or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, nonpublic information.

#### **D. Personal Trading at Same Time as Client**

While BBA 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 BBA, or any Supervised Person of BBA, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

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#### **A. Recommendation of Custodian[s]**

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

Where BBA 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/broker-dealer not recommended by BBA. However, if the recommended Custodian is not engaged, the Advisor may be limited in the services it can provide. BBA may recommend the Custodian based on criteria such as, but not limited to, the reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or location of the Custodian’s offices.

BBA will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. (“Schwab”), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client’s “qualified custodian”. BBA maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab (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 the broker-dealer/custodian in exchange for research and other services. **BBA does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, BBA receives certain benefits from Schwab through their participation in their institutional platform. Please see the disclosure under Item 14 below.**
- 2. Brokerage Referrals** – BBA 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 BBA 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]. 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]). BBA 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. BBA will execute its transactions through the Custodian as directed by the Client.

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BBA may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts on the same trading day. 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 Clients' accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of BBA and periodically by Cassandra Kirby, CCO. 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 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 BBA 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**

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### **A. Compensation Received by BBA**

BBA may refer Clients to various unaffiliated, non-advisory professionals (e.g., attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, BBA may receive non-compensated referrals of new Clients from various third parties.

### Participation in Institutional Advisor Platform

BBA has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like BBA. As a registered investment advisor participating on the Schwab Advisor Services platform, BBA receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab 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 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.

*Services that Benefit the Client* – Schwab's 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 Schwab, 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. Further, 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* – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts,

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the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. 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* – Schwab also offers other services to BBA that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. BBA believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

#### **B. Compensation for Client Referrals**

BBA does not compensate, either directly or indirectly, any persons who are not supervised persons for Client referrals.

#### **Item 15 – Custody**

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BBA does not accept or maintain custody of any Client accounts except for the authorized deduction of the Advisor's fees. 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 BBA to utilize the Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare them to any reports provided by BBA to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

#### **Item 16 – Investment Discretion**

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

#### **Item 17 – Voting Client Securities**

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BBA 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**

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Neither BBA nor its management has any adverse financial situations that would reasonably impair the ability of BBA to meet all obligations to its Clients. Neither BBA nor any of its advisory persons have been subject to a bankruptcy or financial compromise. BBA 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 months or more in the future.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Amy J. Braun-Bostich, CFP®, CFS®, CLTC®, APMA®, MSFS®**  
**Owner, Chief Executive Officer, and Private Wealth Advisor**

**Effective: November 14, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Amy J. Braun-Bostich, CFP®, CFS®, CLTC®, APMA®, MSFS® (CRD# 1710451), in addition to the information contained in the Braun-Bostich & Associates, Inc. (“BBA” or the “Advisor,” CRD# 288336) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the BBA Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (724) 942-2639.

Additional information about Ms. Braun-Bostich is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or individual CRD# 1710451.

## Item 2 – Educational Background and Business Experience

Amy J. Braun-Bostich, CFP®, CFS®, CLTC®, APMA®, MSFS® born in 1957, is dedicated to advising Clients of BBA as an Owner, Chief Executive Officer, and Private Wealth Advisor. Ms. Braun-Bostich earned a Master of Science degree in Financial Planning from the College of Financial Planning in 2016. In addition, Ms. Braun-Bostich also earned a Bachelor of Arts degree in Psychology from the University of California, Los Angeles, in 1981. Ms. Braun-Bostich also earned the CFP® designation in 1994, CFS® designation in 1998, CLTC® designation in 2009, and APMA® designation in 2015. Information about each designation can be found below. Additional information regarding Ms. Braun-Bostich's employment history is included below.

### Employment History:

Owner, Chief Executive Officer, and Private Wealth Advisor, Braun-Bostich & Associates, Inc.	06/2017 to Present
Owner & Chief Executive Officer, Clear Vision Financial Group, Inc.	09/2002 to 06/2017
Registered Representative, Ameriprise Financial Services, Inc.	09/2005 to 05/2017

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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 95,000 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 the CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by the 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 the CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### Certified Fund Specialist® (“CFS®”)

Individuals who hold the CFS® designation have completed a course of study across six modules to develop a strong working knowledge of:

- mutual funds, ETFs, and REITs
- closed-end funds and similar investments
- advanced fund analysis and selection
- asset allocation and portfolio construction

To receive the designation, the candidate must meet the following requirements: 1) either a bachelor's degree or 2,000 hours of financial services work experience, 2) pass three exams and complete a case study, and 3) complete 30 hours of continuing education every two years.

### Certified Long-Term Care (“CLTC®”)

The CLTC, Certified in Long-Term Care designation, is a long-term care planning designation granted by the Corporation for Long-term Care Certification to individuals who satisfy educational, work experience, and ethics requirements. Recipients of the CLTC have completed a rigorous multidisciplinary course and examination, which focuses on long-term care. To maintain this designation, the CLTC must satisfy continuing education requirements and adhere to the CLTC Code of Professional Responsibility.

### Accredited Portfolio Management Advisor<sup>SM</sup> (“APMA®”)

Individuals who hold the APMA® designation have completed a course of study encompassing client assessment and suitability, risk/return, investment objectives, bond and equity portfolios, modern portfolio theory, and investor psychology. Students have hands-on practice in analyzing investment policy statements, building portfolios, and making asset allocation decisions, including sell, hold, and buy decisions within a client's portfolio. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct, and complying with self-disclosure requirements.

## **Item 3 – Disciplinary Information**

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***There are no legal, civil, or disciplinary events to disclose regarding Ms. Braun-Bostich.*** Ms. Braun-Bostich 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. Braun-Bostich. 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. Braun-Bostich.*** However, the Advisor encourages Clients to independently view the background of Ms. Braun-Bostich on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or individual CRD# 1710451.

## **Item 4 – Other Business Activities**

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### J & C Real Estate, LLC

Ms. Braun-Bostich is also a Co-Owner of J & C Real Estate, LLC (“J & C Real Estate”) in Pennsylvania. J & C Real Estate is a real estate holding company. Ms. Braun-Bostich spends approximately two hours (2) per month in this capacity and receives compensation for this activity.

## **Item 5 – Additional Compensation**

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

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## **Item 6 – Supervision**

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Ms. Braun-Bostich serves as an Owner, Chief Executive Officer, and Private Wealth Advisor of BBA. Ms. Braun-Bostich is supervised by Cassandra Kirby, the Chief Compliance Officer. Ms. Kirby can be reached at (724) 942-2639.

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

**Cassandra L. Kirby, CFP®, EA®**  
**Chief Operating Officer, Chief Compliance Officer, and Private Wealth**

**Effective: November 14, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Cassandra L. Kirby, CFP®, EA® (CRD# 4449859), in addition to the information contained in the Braun-Bostich & Associates, Inc. (“BBA” or the “Advisor,” CRD# 288336) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the BBA Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (724) 942-2639.

Additional information about Ms. Kirby is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or individual CRD# 4449859.

## Item 2 – Educational Background and Business Experience

Cassandra L. Kirby, CFP®, EA®, born in 1979, is dedicated to advising Clients of BBA as the Chief Operating Officer, Chief Compliance Officer, and Private Wealth Advisor. Ms. Kirby earned a Bachelor of Business Administration degree from California University of Pennsylvania in 2001. Ms. Kirby also earned her CFP® designation in 2016 and her Enrolled Agent designation in 2017. Information about each designation can be found below. Additional information regarding Ms. Kirby's employment history is included below.

### Employment History:

Chief Operating Officer, Chief Compliance Officer, and Private Wealth Advisor, Braun-Bostich & Associates, Inc.	06/2017 to Present
Associate Financial Advisor, Clear Vision Financial Group, Inc.	08/2003 to 06/2017

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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 95,000 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 the CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by the 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 the CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Enrolled Agent (EA®)

An enrolled agent (EA®) is a federally-authorized tax practitioner who has technical expertise in the field of taxation and who is empowered by the U.S. Department of the Treasury to represent taxpayers before all administrative levels – examination, collection, and appeals – of the Internal Revenue Service. In addition to taxpayer

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representation, Enrolled Agents™ often provide tax consultation services and prepare a wide range of federal and state tax returns.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil, or disciplinary events to disclose regarding Ms. Kirby.*** Ms. Kirby 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. Kirby. 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. Kirby.*** However, the Advisor encourages Clients to independently view the background of Ms. Kirby on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or individual CRD# 4449859.

### **Item 4 – Other Business Activities**

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Ms. Kirby is dedicated to the investment advisory activities of BBA's Client. Ms. Kirby does not have any other business activities.

### **Item 5 – Additional Compensation**

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Ms. Kirby is dedicated to the investment advisory activities of BBA's Clients. Ms. Kirby does not receive any additional forms of compensation.

### **Item 6 – Supervision**

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Ms. Kirby serves as the Chief Operating Officer, Chief Compliance Officer, and Private Wealth Advisor of BBA. Ms. Kirby can be reached at (724) 942-2639.

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

**Douglas G. Bostich**  
**Financial Planning Specialist and Technology Manager**

**Effective: November 14, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Douglas G. Bostich (CRD# 2327303), in addition to the information contained in the Braun-Bostich & Associates, Inc. (“BBA” or the “Advisor,” CRD# 288336) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the BBA Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (724) 942-2639.

Additional information about Mr. Bostich is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 2327303.

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## Item 2 – Educational Background and Business Experience

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Douglas G. Bostich, born in 1968, is dedicated to advising Clients of BBA as a Financial Planning Specialist and Technology Manager. Mr. Bostich earned a Bachelor's degree in Finance from California University of Pennsylvania in 1990. Additional information regarding Mr. Bostich's employment history is included below.

### Employment History:

Financial Planning Specialist and Technology Manager, Braun-Bostich & Associates, Inc.	06/2017 to Present
Paraplanner, Clear Vision Financial Group, Inc.	03/2004 to 06/2017

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## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Bostich.*** Mr. Bostich 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. Bostich. 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. Bostich.*** However, the Advisor encourages Clients to independently view the background of Mr. Bostich on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 2327303.

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## Item 4 – Other Business Activities

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Mr. Bostich is dedicated to the investment advisory activities of BBA's Clients. Mr. Bostich does not have any other business activities.

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## Item 5 – Additional Compensation

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Mr. Bostich is dedicated to the investment advisory activities of BBA's Clients. Mr. Bostich does not receive any additional forms of compensation.

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## Item 6 – Supervision

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Mr. Bostich serves as a Financial Planning Specialist and Technology Manager of BBA and is supervised by Cassandra Kirby, the Chief Compliance Officer. Ms. Kirby can be reached at (724) 942-2639.

BBA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of BBA. Further, BBA is subject to regulatory oversight by various agencies. These agencies require registration by BBA and its Supervised Persons. As a registered entity, BBA is subject to examinations by regulators, which may be announced or unannounced. BBA 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. Pompei, CFP®**  
**Associate Financial Advisor**

**Effective: November 14, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Tammy L. Pompei, CFP® (CRD# 6590708), in addition to the information contained in the Braun-Bostich & Associates, Inc. (“BBA” or the “Advisor,” CRD# 288336) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the BBA Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (724) 942-2639.

Additional information about Ms. Pompei is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or individual CRD# 6590708.

## Item 2 – Educational Background and Business Experience

Tammy L. Pompei, CFP®, born in 1988, is dedicated to advising Clients of BBA as an Associate Financial Advisor. Ms. Pompei earned a Bachelor of Arts degree in English and Spanish from Washington & Jefferson College in 2010. Additional information regarding Ms. Pompei's employment history is included below.

### Employment History:

Associate Financial Advisor, Braun-Bostich & Associates, Inc.	06/2017 to Present
Client Services Specialist, Clear Vision Financial Group, Inc.	12/2015 to 06/2017
Training Rep, Data Science Automation	02/2014 to 11/2015
Admissions, Art Institute	06/2012 to 01/2014

### Certified Financial Planner™ ("CFP®")

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 95,000 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 the CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by the 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 the CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

## Item 3 – Disciplinary Information

**There are no legal, civil, or disciplinary events to disclose regarding Ms. Pompei.** Ms. Pompei 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. Pompei. Securities laws require an advisor to disclose any

**Braun-Bostich & Associates, Inc.**

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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. Pompei.*** However, the Advisor encourages Clients to independently view the background of Ms. Pompei on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or individual CRD# 6590708.

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#### **Item 4 – Other Business Activities**

Ms. Pompei is dedicated to the investment advisory activities of BBA's Clients. Ms. Pompei does not have any other business activities.

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#### **Item 5 – Additional Compensation**

Ms. Pompei is dedicated to the investment advisory activities of BBA's Clients. Ms. Pompei does not receive any additional forms of compensation.

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#### **Item 6 – Supervision**

Ms. Pompei serves as an Associate Financial Advisor of BBA and is supervised by Cassandra Kirby, the Chief Compliance Officer. Ms. Kirby can be reached at (724) 942-2639.

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

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Effective: November 14, 2023

### Our Commitment to You

Braun-Bostich & Associates Inc. ("BBA" 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. BBA (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.

BBA does not sell your nonpublic 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 nonpublic 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?

Driver's license number	Date of birth
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 the 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 Clients' 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 Clients' 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?
<b>Servicing our Clients</b> We may share nonpublic personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, and 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
<b>Marketing Purposes</b> BBA 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 BBA or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your nonpublic personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> BBA does not disclose and does not intend to disclose nonpublic personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### State-specific Regulations

<b>California</b>	In response to a California law, to be conservative, we assume that 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 nonpublic 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 the Advisor at (724) 942-2639.