FORM ADV

UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

Primary Business Name: 1ST FINANCIAL INVESTMENT, INC. **CRD Number: 283072**

Other-Than-Annual Amendment - All Sections **Rev. 10/2021**

7/21/2026 4:18:18 PM

WARNING: Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 4.

Item 1 Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you. If you are filing an *umbrella registration*, the information in Item 1 should be provided for the *filing adviser* only. General Instruction 5 provides information to assist you with filing an *umbrella registration*.

A. Your full legal name (if you are a sole proprietor, your last, first, and middle names):
1ST FINANCIAL INVESTMENT, INC.

B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A.
1ST FINANCIAL INVESTMENT, INC.

List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.

(2) If you are using this Form ADV to register more than one investment adviser under an *umbrella registration*, check this box ☐

If you check this box, complete a Schedule R for each relying adviser.

C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.(1)), enter the new name and specify whether the name change is of
☐ your legal name or ☐ your primary business name:

D. (1) If you are registered with the SEC as an investment adviser, your SEC file number:

(2) If you report to the SEC as an *exempt reporting adviser*, your SEC file number:

(3) If you have one or more Central Index Key numbers assigned by the SEC ("CIK Numbers"), all of your CIK numbers:

No Information Filed

E. (1) If you have a number ("*CRD* Number") assigned by the *FINRA's CRD* system or by the IARD system, your *CRD* number: **283072**

If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.

(2) If you have additional *CRD* Numbers, your additional *CRD* numbers:

No Information Filed

F. *Principal Office and Place of Business*

(1) Address (do not use a P.O. Box):

Number and Street 1:		Number and Street 2:	
116 NORTH STATE STREET		1ST FLOOR	
City:	State:	Country:	ZIP+4/Postal Code:
CLARK'S SUMMIT	Pennsylvania	United States	18411-1056

If this address is a private residence, check this box: ☐

List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for SEC registration, if you are registered only with the SEC, or if you are reporting to the SEC as an exempt reporting adviser, list the largest twenty-five offices in terms of numbers of employees as of the end of your most recently completed fiscal year.

(2) Days of week that you normally conduct business at your *principal office and place of business:*
● Monday - Friday ○ Other:

Normal business hours at this location:
10:00 AM TILL 5:30 PM EASTERN TIME

(3) Telephone number at this location:
570-585-6100

(4) Facsimile number at this location, if any:
570-585-6101

(5) What is the total number of offices, other than your *principal office and place of business*, at which you conduct investment advisory business as of

the end of your most recently completed fiscal year?
4

G. Mailing address, if different from your *principal office and place of business* address:

Number and Street 1: Number and Street 2:
City: State: Country: ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

H. If you are a sole proprietor, state your full residence address, if different from your *principal office and place of business* address in Item 1.F.:

Number and Street 1: Number and Street 2:
City: State: Country: ZIP+4/Postal Code:

Yes No

I. Do you have one or more websites or accounts on publicly available social media platforms (including, but not limited to, Twitter, Facebook and LinkedIn)? ● ○

If "yes," list all firm website addresses and the address for each of the firm's accounts on publicly available social media platforms on Section 1.I. of Schedule D. If a website address serves as a portal through which to access other information you have published on the web, you may list the portal without listing addresses for all of the other information. You may need to list more than one portal address. Do not provide the addresses of websites or accounts on publicly available social media platforms where you do not control the content. Do not provide the individual electronic mail (e-mail) addresses of employees or the addresses of employee accounts on publicly available social media platforms.

J. Chief Compliance Officer

(1) Provide the name and contact information of your Chief Compliance Officer. If you are an *exempt reporting adviser*, you must provide the contact information for your Chief Compliance Officer, if you have one. If not, you must complete Item 1.K. below.

Name: Other titles, if any:
Telephone number: Facsimile number, if any:
Number and Street 1: Number and Street 2:
City: State: Country: ZIP+4/Postal Code:

Electronic mail (e-mail) address, if Chief Compliance Officer has one:

(2) If your Chief Compliance Officer is compensated or employed by any *person* other than you, a *related person* or an investment company registered under the Investment Company Act of 1940 that you advise for providing chief compliance officer services to you, provide the *person's* name and IRS Employer Identification Number (if any):

Name:
IRS Employer Identification Number:

K. Additional Regulatory Contact Person: If a person other than the Chief Compliance Officer is authorized to receive information and respond to questions about this Form ADV, you may provide that information here.

Name: Titles:
Telephone number: Facsimile number, if any:
Number and Street 1: Number and Street 2:
City: State: Country: ZIP+4/Postal Code:

Electronic mail (e-mail) address, if contact person has one:

Yes No

L. Do you maintain some or all of the books and records you are required to keep under Section 204 of the Advisers Act, or similar state law, somewhere other than your *principal office and place of business*? ● ○

If "yes," complete Section 1.L. of Schedule D.

Yes No

M. Are you registered with a *foreign financial regulatory authority*? ○ ●

Answer "no" if you are not registered with a foreign financial regulatory authority, even if you have an affiliate that is registered with a foreign financial regulatory authority. If "yes," complete Section 1.M. of Schedule D.

Yes No

N. Are you a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934? ○ ●

Yes No

O. Did you have $1 billion or more in assets on the last day of your most recent fiscal year? ○ ●
If yes, what is the approximate amount of your assets:

○ $1 billion to less than $10 billion
○ $10 billion to less than $50 billion

○ $50 billion or more

For purposes of Item 1.O. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.

P. Provide your *Legal Entity Identifier* if you have one:

A *legal entity identifier* is a unique number that companies use to identify each other in the financial marketplace. You may not have a *legal entity identifier*.

SECTION 1.B. Other Business Names

List your other business names and the jurisdictions in which you use them. You must complete a separate Schedule D Section 1.B. for each business name.

Name: 1ST FINANCIAL INVESTMENT, INC. OF PENNSYLVANIA

Jurisdictions

☐ AL
☐ AK
☐ AZ
☐ AR
☐ CA
☐ CO
☐ CT
☐ DE
☐ DC
☐ FL
☑ GA
☐ GU
☐ HI
☐ ID

☐ IL
☐ IN
☐ IA
☐ KS
☐ KY
☑ LA
☐ ME
☐ MD
☐ MA
☐ MI
☐ MN
☐ MS
☐ MO
☐ MT

☐ NE
☐ NV
☐ NH
☑ NJ
☐ NM
☐ NY
☐ NC
☐ ND
☐ OH
☐ OK
☐ OR
☐ PA
☐ PR
☐ RI

☐ SC
☐ SD
☐ TN
☐ TX
☐ UT
☐ VT
☐ VI
☐ VA
☐ WA
☐ WV
☐ WI
☐ WY
☐ Other:

SECTION 1.F. Other Offices

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:
Number and Street 2:
City:
State:
Country:
ZIP+4/Postal Code:

If this address is a private residence, check this box: ☑

Telephone Number:
5705856100

Facsimile Number, if any:
5705856101

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?
2

Are other business activities conducted at this office location? (check all that apply)

☐ (1) Broker-dealer (registered or unregistered)
☐ (2) Bank (including a separately identifiable department or division of a bank)
☑ (3) Insurance broker or agent
☐ (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

☐ (5) Registered municipal advisor
☑ (6) Accountant or accounting firm
☐ (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:
638 FAIRVIEW AVENUE

Number and Street 2:

City:
SOUTH ABINGTON TOWNSHIP

State:
Pennsylvania

Country:
United States

ZIP+4/Postal Code:
18411-8955

If this address is a private residence, check this box: ☐

Telephone Number:
570-586-8037

Facsimile Number, if any:
5705856101

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?
1

Are other business activities conducted at this office location? (check all that apply)
☐ (1) Broker-dealer (registered or unregistered)
☐ (2) Bank (including a separately identifiable department or division of a bank)
☐ (3) Insurance broker or agent
☐ (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (5) Registered municipal advisor
☑ (6) Accountant or accounting firm
☐ (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☑

Telephone Number:
1-570-534-0015

Facsimile Number, if any:
570-585-6101

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?
1

Are other business activities conducted at this office location? (check all that apply)
☐ (1) Broker-dealer (registered or unregistered)
☐ (2) Bank (including a separately identifiable department or division of a bank)
☐ (3) Insurance broker or agent
☐ (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

☐ (5) Registered municipal advisor
☐ (6) Accountant or accounting firm
☐ (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1: 1 OAKWOOD DRIVE, SUITE #1, OFFICE # 205		Number and Street 2: REGUS OFFICE SPACE	
City: SCRANTON	State: Pennsylvania	Country: United States	ZIP+4/Postal Code: 18504-9503

If this address is a private residence, check this box: ☐

Telephone Number:
5705856100

Facsimile Number, if any:
5705856101

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?
1

Are other business activities conducted at this office location? (check all that apply)
☐ (1) Broker-dealer (registered or unregistered)
☐ (2) Bank (including a separately identifiable department or division of a bank)
☑ (3) Insurance broker or agent
☐ (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (5) Registered municipal advisor
☐ (6) Accountant or accounting firm
☐ (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:
THIS LOCATION IS MERELY AND PURELY FOR ADMINISTRATIVE WORK PURPOSES. NO BOOKS AND RECORDS ARE KEPT AND/OR WILL BE KEPT AT THIS LOCATION. ALSO, IN ADDITION THERE WILL BE NO CLIENT MEETINGS AT THIS LOCATION.

SECTION 1.I. Website Addresses

List your website addresses, including addresses for accounts on publicly available social media platforms where you control the content (including, but not limited to, Twitter, Facebook and/or LinkedIn). You must complete a separate Schedule D Section 1.I. for each website or account on a publicly available social media platform.

Address of Website/Account on Publicly Available Social Media Platform: HTTP://WWW.1STFINANCIALINVESTMENT.COM

SECTION 1.L. Location of Books and Records

Complete the following information for each location at which you keep your books and records, other than your *principal office and place of business*. You must complete a separate Schedule D, Section 1.L. for each location.

Name of entity where books and records are kept:
OVH GROUP

Number and Street 1: 2 RUE KELLERMANN		Number and Street 2:	
City: ROUBAIX	State:	Country: France	ZIP+4/Postal Code: 59100

If this address is a private residence, check this box: ☐

Telephone Number: +33320827332

Facsimile number, if any:

This is (check one):

○ one of your branch offices or affiliates.

● a third-party unaffiliated recordkeeper.

○ other.

Briefly describe the books and records kept at this location.

ENTITY PROVIDES VIRTUAL PRIVATE SERVER (VPS) FOR OUR FIRM'S IP PBX TELEPHONE SYSTEM. PHONE CALLS MAY BE RECORDED AND ARE STORED ON THE ABOVE ENTITIES SERVER. PRIMARY SERVER LOCATION IS BEAUHARNOIS, CANADA, WITH DAILY BACKUPS AND FAILOVER SERVER LOCATION IS LONDON, ENGLAND, UNITED KINGDON. A BETA SERVER WE UTILIZE TO TEST UPGRADES TO OUR SYSTEM IS LOCATED IN STRASBOURG, FRANCE

Name of entity where books and records are kept: HEATH GOLDSTEIN

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☑

Telephone Number: 570-586-8695

Facsimile number, if any:

This is (check one):

● one of your branch offices or affiliates.

○ a third-party unaffiliated recordkeeper.

○ other.

Briefly describe the books and records kept at this location.

CORPORATION BANK STATEMENTS AND BILLS

Name of entity where books and records are kept: EGNYTE, INC

Number and Street 1: 1350 WEST MIDDLEFIELD ROAD

Number and Street 2:

City: MOUNTAIN VIEW

State: California

Country: United States

ZIP+4/Postal Code: 94043-3061

If this address is a private residence, check this box: ☐

Telephone Number: 1-650-968-4018

Facsimile number, if any:

This is (check one):

○ one of your branch offices or affiliates.

● a third-party unaffiliated recordkeeper.

○ other.

Briefly describe the books and records kept at this location.

ENTITY PROVIDES OFFSITE CLOUD STORAGE FOR ALL CLIENT FILES & RECORDS AS WELL AS BOOK AND RECORDS COMPLIANCE FILES. ENTITY HAS ASSURED THAT THEIR CLOUD STORAGE AND FACILITIES ARE FINRA COMPLIANCE PURSUANT TO FINRA REQUIREMENTS FOR ELECTRONIC STORAGE FACILITIES. COMPANY HAS ASSURED THAT THEY HAVE REGULAR BACKUPS AND REDUNDANCY SERVERS IN MULTIPLE LOCATIONS BOTH IN AND OUT OF THE USA. UNKNOWN WHERE SERVERS ARE LOCATED AS COMPANY WON'T PROVIDE THIS FOR SECURITIES PURPOSES.

Name of entity where books and records are kept:

PATRINIA CORPORATION

Number and Street 1:
1 COATES DRIVE

Number and Street 2:
SUITE 8

City:	State:	Country:	ZIP+4/Postal Code:
GOSHEN	New York	United States	10924-6769

If this address is a private residence, check this box: ☐

Telephone Number:
1-212-233-1155

Facsimile number, if any:

This is (check one):
- ○ one of your branch offices or affiliates.
- ● a third-party unaffiliated recordkeeper.
- ○ other.

Briefly describe the books and records kept at this location.
ENTITY PROVIDES ALL E-MAILING ARCHIVING

Name of entity where books and records are kept:
BILL GOOD MARKETING, INC.

Number and Street 1:
12936 FRONTRUNNER BOULEVARD

Number and Street 2:
SUITE 170

City:	State:	Country:	ZIP+4/Postal Code:
DRAPER	Utah	United States	84020-5482

If this address is a private residence, check this box: ☐

Telephone Number:
1-801-572-1480

Facsimile number, if any:

This is (check one):
- ○ one of your branch offices or affiliates.
- ● a third-party unaffiliated recordkeeper.
- ○ other.

Briefly describe the books and records kept at this location.
ENTITY PROVIDES CRM FOR FORM. CLIENTS' INFORMATION INCLUDING PERSONAL INFORMATION IS STORED ON THE ABOVE ENTITY'S SERVERS. ABOVE ENTITY HAS ACCESS TO CLIENT'S INFORMATION FOR THE PURPOSE OF TECHNICAL SUPPORT AND DATA ENTRY. ENTITY HAS ASSURED REDUNDANCY, BACKUPS OF DATA, SECURITY, AND FIREFALL PROTECTION.

SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

No Information Filed

Item 3 Form of Organization

If you are filing an *umbrella registration*, the information in Item 3 should be provided for the *filing adviser* only.

A. How are you organized?
- ● Corporation
- ○ Sole Proprietorship
- ○ Limited Liability Partnership (LLP)
- ○ Partnership
- ○ Limited Liability Company (LLC)
- ○ Limited Partnership (LP)
- ○ Other (specify):

If you are changing your response to this Item, see Part 1A Instruction 4.

B. In what month does your fiscal year end each year?
DECEMBER

C. Under the laws of what state or country are you organized?

State	Country
Pennsylvania	United States

If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.

If you are changing your response to this Item, see Part 1A Instruction 4.

Item 4 Successions

	Yes	No
A. Are you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., form of organization or state of incorporation)?	○	●

If "yes", complete Item 4.B. and Section 4 of Schedule D.

B. Date of Succession: (MM/DD/YYYY)

If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.

SECTION 4 Successions

No Information Filed

Item 5 Information About Your Advisory Business - Employees, Clients, and Compensation

Responses to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A Instruction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.

Employees

If you are organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).

A. Approximately how many *employees* do you have? Include full- and part-time *employees* but do not include any clerical workers.
8

B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
2

(2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?
0

(3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?
6

(4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?
0

(5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?
3

(6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?
0

In your response to Item 5.B.(6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on your behalf.

Clients

In your responses to Items 5.C. and 5.D. do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

C. (1) To approximately how many *clients* for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?

0

(2) Approximately what percentage of your *clients* are non-*United States persons*?

0%

D. *For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.*
The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, do not answer (1)(d) or (3)(d) below.

Indicate the approximate number of your *clients* and amount of your total regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of *client*. If you have fewer than 5 *clients* in a particular category (other than (d), (e), and (f)) you may check Item 5.D.(2) rather than respond to Item 5.D.(1).

The aggregate amount of regulatory assets under management reported in Item 5.D.(3) should equal the total amount of regulatory assets under management reported in Item 5.F.(2)(c) below.

If a *client* fits into more than one category, select one category that most accurately represents the *client* to avoid double counting *clients* and assets. If you advise a registered investment company, business development company, or pooled investment vehicle, report those assets in categories (d), (e), and (f) as applicable.

Type of *Client*	**(1) Number of *Client(s)***	**(2) Fewer than 5 *Clients***	**(3) Amount of Regulatory Assets under Management**
(a) Individuals (other than *high net worth individuals*)	12	☐	$ 725,674
(b) *High net worth individuals*	4	☐	$ 56,322
(c) Banking or thrift institutions	0	☐	$ 0
(d) Investment companies	0		$ 0
(e) Business development companies	0		$ 0
(f) Pooled investment vehicles (other than investment companies and business development companies)	0		$ 0
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	0	☐	$ 0
(h) Charitable organizations	0	☐	$ 0
(i) State or municipal *government entities* (including government pension plans)	0	☐	$ 0
(j) Other investment advisers	0	☐	$ 0
(k) Insurance companies	0	☐	$ 0
(l) Sovereign wealth funds and foreign official institutions	0	☐	$ 0
(m) Corporations or other businesses not listed above	0	☑	$ 154
(n) Other:	0	☐	$

Compensation Arrangements

E. You are compensated for your investment advisory services by (check all that apply):

☑ (1) A percentage of assets under your management
☑ (2) Hourly charges
☐ (3) Subscription fees (for a newsletter or periodical)
☐ (4) Fixed fees (other than subscription fees)
☐ (5) Commissions
☐ (6) *Performance-based fees*
☐ (7) Other (specify):

Item 5 Information About Your Advisory Business - Regulatory Assets Under Management

Regulatory Assets Under Management

		Yes	**No**
F.	(1) Do you provide continuous and regular supervisory or management services to securities portfolios?	●	○

(2) If yes, what is the amount of your regulatory assets under management and total number of accounts?

	U.S. Dollar Amount	Total Number of Accounts
Discretionary:	(a) $ 0	(d) 0

Non-Discretionary:	(b)	$ 782,150	(e)	27
Total:	(c)	$ 782,150	(f)	27

Part 1A Instruction 5.b. explains how to calculate your regulatory assets under management. You must follow these instructions carefully when completing this Item.

(3) What is the approximate amount of your total regulatory assets under management (reported in Item 5.F.(2)(c) above) attributable to *clients* who are non-*United States persons*?

$ 0

Item 5 Information About Your Advisory Business - Advisory Activities

Advisory Activities

G. What type(s) of advisory services do you provide? Check all that apply.

- ☑ (1) Financial planning services
- ☑ (2) Portfolio management for individuals and/or small businesses
- ☐ (3) Portfolio management for investment companies (as well as "business development companies" that have made an election pursuant to section 54 of the Investment Company Act of 1940)
- ☐ (4) Portfolio management for pooled investment vehicles (other than investment companies)
- ☐ (5) Portfolio management for businesses (other than small businesses) or institutional *clients* (other than registered investment companies and other pooled investment vehicles)
- ☐ (6) Pension consulting services
- ☑ (7) Selection of other advisers (including *private fund* managers)
- ☑ (8) Publication of periodicals or newsletters
- ☐ (9) Security ratings or pricing services
- ☐ (10) Market timing services
- ☑ (11) Educational seminars/workshops
- ☐ (12) Other(specify):

Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report the 811 or 814 number of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Schedule D.

H. If you provide financial planning services, to how many *clients* did you provide these services during your last fiscal year?

- ● 0
- ○ 1 - 10
- ○ 11 - 25
- ○ 26 - 50
- ○ 51 - 100
- ○ 101 - 250
- ○ 251 - 500
- ○ More than 500

If more than 500, how many?
(round to the nearest 500)

In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

		Yes	No
I.	(1) Do you participate in a *wrap fee program*?	●	○

(2) If you participate in a *wrap fee program*, what is the amount of your regulatory assets under management attributable to acting as:

(a) *sponsor* to a *wrap fee program*
$ 0

(b) portfolio manager for a *wrap fee program*?
$ 0

(c) *sponsor* to and portfolio manager for the same *wrap fee program*?
$ 0

If you report an amount in Item 5.I.(2)(c), do not report that amount in Item 5.I.(2)(a) or Item 5.I.(2)(b).

If you are a portfolio manager for a wrap fee program, list the names of the programs, their sponsors and related information in Section 5.I.(2) of Schedule D.

If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2).

		Yes	No
J.	(1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?	○	●

(2) Do you report *client* assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? ○ ●

K. Separately Managed Account *Clients*

Yes No

(1) Do you have regulatory assets under management attributable to *clients* other than those listed in Item 5.D.(3)(d)-(f) (separately managed account *clients*)? ● ○

If yes, complete Section 5.K.(1) of Schedule D.

(2) Do you engage in borrowing transactions on behalf of any of the separately managed account *clients* that you advise? ○ ●

If yes, complete Section 5.K.(2) of Schedule D.

(3) Do you engage in derivative transactions on behalf of any of the separately managed account *clients* that you advise? ○ ●

If yes, complete Section 5.K.(2) of Schedule D.

(4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management? ● ○

If yes, complete Section 5.K.(3) of Schedule D for each custodian.

L. Marketing Activities

Yes No

(1) Do any of your *advertisements* include:

(a) Performance results? ○ ●

(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))? ○ ●

(c) *Testimonials* (other than those that satisfy rule 206(4)-1(b)(4)(ii))? ○ ●

(d) *Endorsements* (other than those that satisfy rule 206(4)-1(b)(4)(ii))? ○ ●

(e) *Third-party ratings*? ○ ●

(2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of *testimonials*, *endorsements*, or *third-party ratings*? ○ ○

(3) Do any of your *advertisements* include *hypothetical performance* ? ○ ●

(4) Do any of your *advertisements* include *predecessor performance* ? ○ ●

SECTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies

No Information Filed

SECTION 5.I.(2) *Wrap Fee Programs*

No Information Filed

SECTION 5.K.(1) Separately Managed Accounts

After subtracting the amounts reported in Item 5.D.(3)(d)-(f) from your total regulatory assets under management, indicate the approximate percentage of this remaining amount attributable to each of the following categories of assets. If the remaining amount is at least $10 billion in regulatory assets under management, complete Question (a). If the remaining amount is less than $10 billion in regulatory assets under management, complete Question (b).

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment* . Mid-year is the date six months before the end of year date. Each column should add up to 100% and numbers should be rounded to the nearest percent.

Investments in derivatives, registered investment companies, business development companies, and pooled investment vehicles should be reported in those categories. Do not report those investments based on related or underlying portfolio assets. Cash equivalents include bank deposits, certificates of deposit, bankers' acceptances and similar bank instruments.

Some assets could be classified into more than one category or require discretion about which category applies. You may use your own internal methodologies and the conventions of your service providers in determining how to categorize assets, so long as the methodologies or conventions are consistently applied and consistent with information you report internally and to current and prospective clients. However, you should not double count assets, and your responses must be consistent with any instructions or other guidance relating to this Section.

(a)

Asset Type	Mid-year	End of year
(i) Exchange-Traded Equity Securities	%	%
(ii) Non Exchange-Traded Equity Securities	%	%
(iii) U.S. Government/Agency Bonds	%	%
(iv) U.S. State and Local Bonds	%	%
(v) *Sovereign Bonds*	%	%
(vi) Investment Grade Corporate Bonds	%	%
(vii) Non-Investment Grade Corporate Bonds	%	%
(viii) Derivatives	%	%
(ix) Securities Issued by Registered Investment Companies or Business Development Companies	%	%
(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	%	%
(xi) Cash and Cash Equivalents	%	%
(xii) Other	%	%

Generally describe any assets included in "Other"

(b)

Asset Type	End of year
(i) Exchange-Traded Equity Securities	47 %
(ii) Non Exchange-Traded Equity Securities	0 %
(iii) U.S. Government/Agency Bonds	0 %
(iv) U.S. State and Local Bonds	0 %
(v) *Sovereign Bonds*	0 %
(vi) Investment Grade Corporate Bonds	0 %
(vii) Non-Investment Grade Corporate Bonds	0 %
(viii) Derivatives	0 %
(ix) Securities Issued by Registered Investment Companies or Business Development Companies	39 %
(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	0 %
(xi) Cash and Cash Equivalents	4 %
(xii) Other	10 %

Generally describe any assets included in "Other"
NON-TRADED ALTERNATIVE INVESTMENTS

SECTION 5.K.(2) Separately Managed Accounts - Use of *Borrowings* and Derivatives

☑ **No information is required to be reported in this Section 5.K.(2) per the instructions of this Section 5.K.(2)**

If your regulatory assets under management attributable to separately managed accounts are at least $10 billion, you should complete Question (a). If your regulatory assets under management attributable to separately managed accounts are at least $500 million but less than $10 billion, you should complete Question (b).

(a) In the table below, provide the following information regarding the separately managed accounts you advise. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise. End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of *borrowings* for the accounts included in column 1.

In column 3, provide aggregate *gross notional value* of derivatives divided by the aggregate regulatory assets under management of the accounts included in column 1 with respect to each category of derivatives specified in 3(a) through (f).

You may, but are not required to, complete the table with respect to any separately managed account with regulatory assets under management of less than $10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

(i) Mid-Year

Gross Notional Exposure	**(1) Regulatory Assets Under Management**	**(2) *Borrowings***	**(3) Derivative Exposures**					
			(a) *Interest Rate Derivative*	**(b) *Foreign Exchange Derivative***	**(c) *Credit Derivative***	**(d) *Equity Derivative***	**(e) *Commodity Derivative***	**(f) *Other Derivative***
Less than 10%	$ 0	$ 0	0 %	0 %	0 %	0 %	0 %	0 %
10-149%	$ 0	$ 0	0 %	0 %	0 %	0 %	0 %	0 %
150% or more	$ 0	$ 0	0 %	0 %	0 %	0 %	0 %	0 %

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(ii) End of Year

Gross Notional Exposure	**(1) Regulatory Assets Under Management**	**(2) *Borrowings***	**(3) Derivative Exposures**					
			(a) *Interest Rate Derivative*	**(b) *Foreign Exchange Derivative***	**(c) *Credit Derivative***	**(d) *Equity Derivative***	**(e) *Commodity Derivative***	**(f) *Other Derivative***
Less than 10%	$ 0	$ 0	0 %	0 %	0 %	0 %	0 %	0 %
10-149%	$ 0	$ 0	0 %	0 %	0 %	0 %	0 %	0 %
150% or more	$ 0	$ 0	0 %	0 %	0 %	0 %	0 %	0 %

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(b) In the table below, provide the following information regarding the separately managed accounts you advise as of the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of *borrowings* for the accounts included in column 1.

You may, but are not required to, complete the table with respect to any separately managed accounts with regulatory assets under management of less than $10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

Gross Notional Exposure	**(1) Regulatory Assets Under Management**	**(2) *Borrowings***
Less than 10%	$ 0	$ 0
10-149%	$ 0	$ 0
150% or more	$ 0	$ 0

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

SECTION 5.K.(3) Custodians for Separately Managed Accounts

Complete a separate Schedule D Section 5.K.(3) for each custodian that holds ten percent or more of your aggregate separately managed account regulatory assets under management.

(a) Legal name of custodian:
SEI INVESTMENTS DISTRIBUTION CO.

(b) Primary business name of custodian:
SEI INVESTMENTS DISTRIBUTION CO.

(c) The location(s) of the custodian's office(s) responsible for *custody* of the assets :

City:	State:	Country:
OAKS	Pennsylvania	United States

Yes No

(d) Is the custodian a *related person* of your firm? ○ ●

(e) If the custodian is a broker-dealer, provide its SEC registration number (if any)
8 - 27897

(f) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?
$ 15,308,331

(a) Legal name of custodian:
SS&C TECHNOLOGIES, INC

(b) Primary business name of custodian:
DST VISION

(c) The location(s) of the custodian's office(s) responsible for *custody* of the assets :

City:	State:	Country:
KANSAS CITY	Missouri	United States

Yes No

(d) Is the custodian a *related person* of your firm? ○ ●

(e) If the custodian is a broker-dealer, provide its SEC registration number (if any)
-

(f) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?
$ 103,216

Item 6 Other Business Activities

In this Item, we request information about your firm's other business activities.

A. You are actively engaged in business as a (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☑ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☑ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☑ (12) accountant or accounting firm
☐ (13) lawyer or law firm
☑ (14) other financial product salesperson (specify): TAX PREPARATION

If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule D.

Yes No

B. (1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)? ● ○

(2) If yes, is this other business your primary business? ● ○

If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.

Yes No

(3) Do you sell products or provide services other than investment advice to your advisory *clients*? ● ○

If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.

SECTION 6.A. Names of Your Other Businesses

If you are actively engaged in other business using a different name, provide that name and the other line(s) of business.

Other Business Name: 1ST FINANCIAL INVESTMENTS, INC.

Other line(s) of business in which you engage using this name (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☐ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☐ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☐ (12) accountant or accounting firm
☐ (13) lawyer or law firm
☑ (14) other financial product salesperson (specify): NOTARY

If you are actively engaged in other business using a different name, provide that name and the other line(s) of business.

Other Business Name: 1ST FINANCIAL SAFEGUARD CO.

Other line(s) of business in which you engage using this name (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☐ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☑ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☐ (12) accountant or accounting firm
☐ (13) lawyer or law firm
☐ (14) other financial product salesperson (specify):

If you are actively engaged in other business using a different name, provide that name and the other line(s) of business.

Other Business Name: 1ST FINANCIAL SERVICES, CO.

Other line(s) of business in which you engage using this name (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☑ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☐ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☐ (12) accountant or accounting firm
☐ (13) lawyer or law firm

☐ (14) other financial product salesperson (specify):

If you are actively engaged in other business using a different name, provide that name and the other line(s) of business.

Other Business Name: 1ST FINANCIAL TAX SERVICES, LLC

Other line(s) of business in which you engage using this name (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☐ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☐ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☐ (12) accountant or accounting firm
☐ (13) lawyer or law firm
☑ (14) other financial product salesperson (specify): TAX PREPARATION SERVICE

If you are actively engaged in other business using a different name, provide that name and the other line(s) of business.

Other Business Name: AG CONSULTING, LLC T/A ADAM GOLD CPA'S TAX SERVICES

Other line(s) of business in which you engage using this name (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☐ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☐ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☑ (12) accountant or accounting firm
☐ (13) lawyer or law firm
☐ (14) other financial product salesperson (specify):

If you are actively engaged in other business using a different name, provide that name and the other line(s) of business.

Other Business Name: GALAT & COMPANY

Other line(s) of business in which you engage using this name (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☐ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☐ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☑ (12) accountant or accounting firm
☐ (13) lawyer or law firm
☐ (14) other financial product salesperson (specify):

If you are actively engaged in other business using a different name, provide that name and the other line(s) of business.

Other Business Name: HEATH GOLDSTEIN

Other line(s) of business in which you engage using this name (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☐ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☑ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☐ (12) accountant or accounting firm
☐ (13) lawyer or law firm
☐ (14) other financial product salesperson (specify):

If you are actively engaged in other business using a different name, provide that name and the other line(s) of business.

Other Business Name: J GOLD CONSULTING LLC

Other line(s) of business in which you engage using this name (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☐ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☐ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☑ (12) accountant or accounting firm
☐ (13) lawyer or law firm
☐ (14) other financial product salesperson (specify):

If you are actively engaged in other business using a different name, provide that name and the other line(s) of business.

Other Business Name: JORDAN GOLDSTEIN

Other line(s) of business in which you engage using this name (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☐ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☐ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☑ (12) accountant or accounting firm
☐ (13) lawyer or law firm
☐ (14) other financial product salesperson (specify):

If you are actively engaged in other business using a different name, provide that name and the other line(s) of business.

Other Business Name: PHILIP GOLDSTEIN

Other line(s) of business in which you engage using this name (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☐ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☑ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☐ (12) accountant or accounting firm
☐ (13) lawyer or law firm
☐ (14) other financial product salesperson (specify):

If you are actively engaged in other business using a different name, provide that name and the other line(s) of business.

Other Business Name: SOCIETY FOR FINANCIAL AWARENESS

Other line(s) of business in which you engage using this name (check all that apply):

☐ (1) broker-dealer (registered or unregistered)
☐ (2) registered representative of a broker-dealer
☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (4) futures commission merchant
☐ (5) real estate broker, dealer, or agent
☐ (6) insurance broker or agent
☐ (7) bank (including a separately identifiable department or division of a bank)
☐ (8) trust company
☐ (9) registered municipal advisor
☐ (10) registered security-based swap dealer
☐ (11) major security-based swap participant
☐ (12) accountant or accounting firm
☐ (13) lawyer or law firm
☑ (14) other financial product salesperson (specify): AFFILIATED WITH NON-PROFIT 501(C)(3) ENTITY TO PROVIDE FINANCIAL EDUCATION

SECTION 6.B.(2) Description of Primary Business

Describe your primary business (not your investment advisory business):

FIXED ANNUITIES, EQUITY INDEX ANNUITIES, FIXED LIFE INSURANCE, ACCIDENT & HEALTH INSURANCE, AND LONG-TERM INSURANCE. NOTARY SERVICES. ALSO USE AS DBA FOR SECURITIES BUSINESS. ALSO PROVIDE COLLEGE PLANNING, SOCIAL SECURITY CONSULTING, AND TAX PREPRATION

If you engage in that business under a different name, provide that name:

1ST FINANCIAL INVESTMENTS; PA 1ST FINANCIAL INVESTMENTS; 1ST FINANCIAL TAX SERVICES; 1ST FINANCIAL SAFEGUARD; 1ST FINANCIAL SVCS

SECTION 6.B.(3) Description of Other Products and Services

Describe other products or services you sell to your *client*. You may omit products and services that you listed in Section 6.B.(2) above.
CONSULTING AND MARKETING ON COLLEGE PLANNING IN ASSISTING THOSE WITH THE FAFA FORM AND HOW TO GET FINANCIAL AID, HOW TO MAXIMIZE SOCIAL SECURITY BENEFITS, AND OFFERING LIFE INSURANCE TO THOSE WHO HAVE HAD SOME SORT OF WEIGHT LOSS SURGERY, TAX PREP SERVICES

If you engage in that business under a different name, provide that name:

COLLEGE PLANNING SERVICES; SOCIAL SECURITY CONSULTING SERVICES; BARIATRIC SOLUTIONS FOR LIFE; 1ST FINANCIAL TAX SERVICES

Item 7 Financial Industry Affiliations

In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your *clients*.

A. This part of Item 7 requires you to provide information about you and your *related persons*, including foreign affiliates. Your *related persons* are all of your *advisory affiliates* and any *person* that is under common *control* with you.

You have a *related person* that is a (check all that apply):

☑ (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)

☑ (2) other investment adviser (including financial planners)
☐ (3) registered municipal advisor
☐ (4) registered security-based swap dealer
☐ (5) major security-based swap participant
☐ (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
☐ (7) futures commission merchant
☐ (8) banking or thrift institution
☐ (9) trust company
☑ (10) accountant or accounting firm
☐ (11) lawyer or law firm
☑ (12) insurance company or agency
☐ (13) pension consultant
☐ (14) real estate broker or dealer
☐ (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
☐ (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).

Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.

For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.

You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.

You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

SECTION 7.A. Financial Industry Affiliations

Complete a separate Schedule D Section 7.A. for each *related person* listed in Item 7.A.

1. Legal Name of *Related Person*:
VESTECH SECURITIES, INC.

2. Primary Business Name of *Related Person*:
VESTECH SECURITIES, INC.

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
8 - 49409
or
Other

4. *Related Person's*
(a) *CRD* Number (if any):
41409
(b) CIK Number(s) (if any):
No Information Filed

5. *Related Person* is: (check all that apply)
(a) ☑ broker-dealer, municipal securities dealer, or government securities broker or dealer
(b) ☐ other investment adviser (including financial planners)
(c) ☐ registered municipal advisor
(d) ☐ registered security-based swap dealer
(e) ☐ major security-based swap participant
(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g) ☐ futures commission merchant
(h) ☐ banking or thrift institution
(i) ☐ trust company
(j) ☐ accountant or accounting firm
(k) ☐ lawyer or law firm
(l) ☑ insurance company or agency
(m) ☐ pension consultant

(n) ☐ real estate broker or dealer
(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
(p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*? ○ ●

7. Are you and the *related person* under common *control*? ○ ●

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*? ○ ●
   (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*? ○ ○
   (c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:
   Number and Street 1: Number and Street 2:
   City: State: Country: ZIP+4/Postal Code:
   If this address is a private residence, check this box: ☐

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration? ○ ○
   (b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ? ○ ●
    (b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.
    No Information Filed

11. Do you and the *related person* share any *supervised persons*? ○ ●

12. Do you and the *related person* share the same physical location? ● ○

---

1. Legal Name of *Related Person*:
   ADAM GOLDSTEIN

2. Primary Business Name of *Related Person*:
   AG CONSULTING, LLC T/A ADAM GOLD CPA'S TAX SERVICES

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
   -
   or
   Other

4. *Related Person's*
   (a) *CRD* Number (if any):

   (b) CIK Number(s) (if any):
   No Information Filed

5. *Related Person* is: (check all that apply)
   (a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
   (b) ☐ other investment adviser (including financial planners)
   (c) ☐ registered municipal advisor
   (d) ☐ registered security-based swap dealer
   (e) ☐ major security-based swap participant
   (f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
   (g) ☐ futures commission merchant
   (h) ☐ banking or thrift institution
   (i) ☐ trust company
   (j) ☑ accountant or accounting firm
   (k) ☐ lawyer or law firm
   (l) ☐ insurance company or agency
   (m) ☐ pension consultant
   (n) ☐ real estate broker or dealer
   (o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
   (p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*? ○ ●

7. Are you and the *related person* under common *control*? ○ ●

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*? ○ ●

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*? ○ ○

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1: Number and Street 2:
City: State: Country: ZIP+4/Postal Code:
If this address is a private residence, check this box: ☐

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration? ○ ●

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ? ○ ●

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*? ● ○

12. Do you and the *related person* share the same physical location? ○ ●

---

1. Legal Name of *Related Person*:
CHARLES GALAT

2. Primary Business Name of *Related Person*:
GALAT & COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4. *Related Person's*

(a) *CRD* Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
(b) ☐ other investment adviser (including financial planners)
(c) ☐ registered municipal advisor
(d) ☐ registered security-based swap dealer
(e) ☐ major security-based swap participant
(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g) ☐ futures commission merchant
(h) ☐ banking or thrift institution
(i) ☐ trust company
(j) ☑ accountant or accounting firm
(k) ☐ lawyer or law firm
(l) ☐ insurance company or agency
(m) ☐ pension consultant
(n) ☐ real estate broker or dealer
(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
(p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*? ○ ●

7. Are you and the *related person* under common *control*? ○ ●

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*? ○ ●

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*? ○ ○

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1: Number and Street 2:

City: State: Country: ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

	Yes	No
9. (a) If the *related person* is an investment adviser, is it exempt from registration?	○	●

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?	○	●

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?	●	○
12. Do you and the *related person* share the same physical location?	○	●

---

1. Legal Name of *Related Person*:
JORDAN GOLDSTEIN

2. Primary Business Name of *Related Person*:
J GOLD CONSULTING

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4. *Related Person's*

(a) *CRD* Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b) ☐ other investment adviser (including financial planners)
- (c) ☐ registered municipal advisor
- (d) ☐ registered security-based swap dealer
- (e) ☐ major security-based swap participant
- (f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g) ☐ futures commission merchant
- (h) ☐ banking or thrift institution
- (i) ☐ trust company
- (j) ☑ accountant or accounting firm
- (k) ☐ lawyer or law firm
- (l) ☐ insurance company or agency
- (m) ☐ pension consultant
- (n) ☐ real estate broker or dealer
- (o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

	Yes	No
6. Do you *control* or are you *controlled* by the *related person*?	○	●
7. Are you and the *related person* under common *control*?	○	●
8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?	○	●
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?	○	○

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1: Number and Street 2:

City: State: Country: ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

	Yes	No
9. (a) If the *related person* is an investment adviser, is it exempt from registration?	○	●

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ? ○ ●

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*? ● ○

12. Do you and the *related person* share the same physical location? ○ ●

---

1. Legal Name of *Related Person*:
HEATH GOLDSTEIN

2. Primary Business Name of *Related Person*:
1ST FINANCIAL INVESTMENTS, INC. & 1ST FINANCIAL SAFEGUARD, CO.; 1ST FINANCIAL SERVICES, CO.

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4. *Related Person's*

(a) *CRD* Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a) ☑ broker-dealer, municipal securities dealer, or government securities broker or dealer
(b) ☐ other investment adviser (including financial planners)
(c) ☐ registered municipal advisor
(d) ☐ registered security-based swap dealer
(e) ☐ major security-based swap participant
(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g) ☐ futures commission merchant
(h) ☐ banking or thrift institution
(i) ☐ trust company
(j) ☐ accountant or accounting firm
(k) ☐ lawyer or law firm
(l) ☑ insurance company or agency
(m) ☐ pension consultant
(n) ☐ real estate broker or dealer
(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
(p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*? ● ○

7. Are you and the *related person* under common *control*? ● ○

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*? ○ ●

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*? ○ ○

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:
Number and Street 2:
City:
State:
Country:
ZIP+4/Postal Code:
If this address is a private residence, check this box: ☐

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration? ○ ○

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ? ○ ●

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*? ○ ●

12. Do you and the *related person* share the same physical location? ● ○

---

1. Legal Name of *Related Person*:
PHILIP GOLDSTEIN

2. Primary Business Name of *Related Person*:
1ST FINANCIAL INVESTMENTS, INC. & 1ST FINANCIAL SAFEGUARD, CO.

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4. *Related Person's*
(a) *CRD* Number (if any):

(b) CIK Number(s) (if any):
No Information Filed

5. *Related Person* is: (check all that apply)
(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
(b) ☐ other investment adviser (including financial planners)
(c) ☐ registered municipal advisor
(d) ☐ registered security-based swap dealer
(e) ☐ major security-based swap participant
(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g) ☐ futures commission merchant
(h) ☐ banking or thrift institution
(i) ☐ trust company
(j) ☐ accountant or accounting firm
(k) ☐ lawyer or law firm
(l) ☑ insurance company or agency
(m) ☐ pension consultant
(n) ☐ real estate broker or dealer
(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
(p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*? ● ○

7. Are you and the *related person* under common *control*? ● ○

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*? ○ ●

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*? ○ ○

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:
Number and Street 1: Number and Street 2:
City: State: Country: ZIP+4/Postal Code:
If this address is a private residence, check this box: ☐

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration? ○ ○

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ? ○ ●

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.
No Information Filed

11. Do you and the *related person* share any *supervised persons*? ● ○

12. Do you and the *related person* share the same physical location? ● ○

---

1. Legal Name of *Related Person*:

SEI INVESTMENTS MANAGEMENT CORP

2. Primary Business Name of *Related Person*:
SEI INVESTMENTS MANAGEMENT CORP

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
801 - 24593
or
Other

4. *Related Person's*
(a) *CRD* Number (if any):
105146
(b) CIK Number(s) (if any):

CIK Number
1000152

5. *Related Person* is: (check all that apply)
(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
(b) ☑ other investment adviser (including financial planners)
(c) ☐ registered municipal advisor
(d) ☐ registered security-based swap dealer
(e) ☐ major security-based swap participant
(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g) ☐ futures commission merchant
(h) ☐ banking or thrift institution
☐
(j) ☐ accountant or accounting firm
(k) ☐ lawyer or law firm
(l) ☐ insurance company or agency
(m) ☐ pension consultant
(n) ☐ real estate broker or dealer
(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
(p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*? ○ ●

7. Are you and the *related person* under common *control*? ○ ●

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*? ○ ●
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*? ○ ○
(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:
Number and Street 1: Number and Street 2:
City: State: Country: ZIP+4/Postal Code:
If this address is a private residence, check this box: ☐

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration? ○ ●
(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ? ○ ●
(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.
No Information Filed

11. Do you and the *related person* share any *supervised persons*? ○ ●

12. Do you and the *related person* share the same physical location? ○ ●

---

1. Legal Name of *Related Person*:
VESTECH ASSET MANAGEMENT INC.

2. Primary Business Name of *Related Person*:
VESTECH ASSET MANAGEMENT INC.

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4. *Related Person's*
   (a) *CRD* Number (if any):
   285685
   (b) CIK Number(s) (if any):
   No Information Filed

5. *Related Person* is: (check all that apply)
   - (a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
   - (b) ☑ other investment adviser (including financial planners)
   - (c) ☐ registered municipal advisor
   - (d) ☐ registered security-based swap dealer
   - (e) ☐ major security-based swap participant
   - (f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
   - (g) ☐ futures commission merchant
   - (h) ☐ banking or thrift institution
   - (i) ☐ trust company
   - (j) ☐ accountant or accounting firm
   - (k) ☐ lawyer or law firm
   - (l) ☐ insurance company or agency
   - (m) ☐ pension consultant
   - (n) ☐ real estate broker or dealer
   - (o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
   - (p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

	Yes	No
6. Do you *control* or are you *controlled* by the *related person*?	○	●
7. Are you and the *related person* under common *control*?	○	●
8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?	○	●
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?	○	○

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:
Number and Street 1: Number and Street 2:
City: State: Country: ZIP+4/Postal Code:
If this address is a private residence, check this box: ☐

	Yes	No
9. (a) If the *related person* is an investment adviser, is it exempt from registration?	○	●
(b) If the answer is yes, under what exemption?		
10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?	○	●

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.
No Information Filed

11. Do you and the *related person* share any *supervised persons*?	○	●
12. Do you and the *related person* share the same physical location?	○	●

Item 7 *Private Fund* Reporting

	Yes	No
B. Are you an adviser to any *private fund*?	○	●

If "yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.

In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or *designation in place of the fund's name.*

SECTION 7.B.(1) *Private Fund* Reporting

No Information Filed

SECTION 7.B.(2) *Private Fund* Reporting

No Information Filed

Item 8 Participation or Interest in *Client* Transactions

In this Item, we request information about your participation and interest in your *clients*' transactions. This information identifies additional areas in which conflicts of interest may occur between you and your *clients*. Newly-formed advisers should base responses to these questions on the types of participation and interest that you expect to engage in during the next year.

Like Item 7, Item 8 requires you to provide information about you and your *related persons*, including foreign affiliates.

Proprietary Interest in *Client* Transactions

		Yes	No
A.	Do you or any *related person*:		
(1)	buy securities for yourself from advisory *clients*, or sell securities you own to advisory *clients* (principal transactions)?	○	●
(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory *clients*?	●	○
(3)	recommend securities (or other investment products) to advisory *clients* in which you or any *related person* has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	○	●

Sales Interest in *Client* Transactions

		Yes	No
B.	Do you or any *related person*:		
(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory *client* securities are sold to or bought from the brokerage customer (agency cross transactions)?	○	●
(2)	recommend to advisory *clients*, or act as a purchaser representative for advisory *clients* with respect to, the purchase of securities for which you or any *related person* serves as underwriter or general or managing partner?	○	●
(3)	recommend purchase or sale of securities to advisory *clients* for which you or any *related person* has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	○	●

Investment or Brokerage Discretion

		Yes	No
C.	Do you or any *related person* have *discretionary authority* to determine the:		
(1)	securities to be bought or sold for a *client's* account?	○	●
(2)	amount of securities to be bought or sold for a *client's* account?	○	●
(3)	broker or dealer to be used for a purchase or sale of securities for a *client's* account?	○	●
(4)	commission rates to be paid to a broker or dealer for a *client's* securities transactions?	○	●
D.	If you answer "yes" to C.(3) above, are any of the brokers or dealers *related persons*?	○	●
E.	Do you or any *related person* recommend brokers or dealers to *clients*?	●	○
F.	If you answer "yes" to E. above, are any of the brokers or dealers *related persons*?	○	●
G. (1)	Do you or any *related person* receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with *client* securities transactions?	●	○
(2)	If "yes" to G.(1) above, are all the "soft dollar benefits" you or any *related persons* receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	●	○
H. (1)	Do you or any *related person*, directly or indirectly, compensate any *person* that is not an *employee* for *client* referrals?	○	●
(2)	Do you or any *related person*, directly or indirectly, provide any *employee* compensation that is specifically related to obtaining *clients* for the firm (cash or non-cash compensation in addition to the *employee's* regular salary)?	○	●
I.	Do you or any *related person*, including any *employee*, directly or indirectly, receive compensation from any *person* (other than you or any *related person*) for *client* referrals?	○	●

In your response to Item 8.I., do not include the regular salary you pay to an employee.

In responding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or received from (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.

Item 9 Custody

In this Item, we ask you whether you or a *related person* has *custody* of *client* (other than *clients* that are investment companies registered under the Investment Company Act of 1940) assets and about your custodial practices.

A. (1) Do you have *custody* of any advisory *clients'*:	**Yes**	**No**
(a) cash or bank accounts?	○	●
(b) securities?	○	●

If you are registering or registered with the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from your clients' accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption that you are not operationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person.

(2) If you checked "yes" to Item 9.A.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which you have *custody*:

U.S. Dollar Amount	Total Number of *Clients*
(a) $	(b)

If you are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you provide to clients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.(2).

B. (1) In connection with advisory services you provide to *clients*, do any of your *related persons* have *custody* of any of your advisory *clients'*:	**Yes**	**No**
(a) cash or bank accounts?	○	●
(b) securities?	○	●

You are required to answer this item regardless of how you answered Item 9.A.(1)(a) or (b).

(2) If you checked "yes" to Item 9.B.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which your *related persons* have *custody*:

U.S. Dollar Amount	Total Number of *Clients*
(a) $ 0	(b) 0

C. If you or your *related persons* have *custody* of *client* funds or securities in connection with advisory services you provide to *clients*, check all the following that apply:

(1) A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage. ☐

(2) An *independent public accountant* audits annually the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the investors in the pools. ☐

(3) An *independent public accountant* conducts an annual surprise examination of *client* funds and securities. ☐

(4) An *independent public accountant* prepares an internal control report with respect to custodial services when you or your *related persons* are qualified custodians for *client* funds and securities. ☐

If you checked Item 9.C.(2), C.(3) or C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal control report. (If you checked Item 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the private funds you advise in Section 7.B.(1) of Schedule D).

D. Do you or your *related person(s)* act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*?	**Yes**	**No**
(1) you act as a qualified custodian	○	●
(2) your *related person(s)* act as qualified custodian(s)	○	●

If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

E. If you are filing your *annual updating amendment* and you were subject to a surprise examination by an *independent public accountant* during your last fiscal year, provide the date (MM/YYYY) the examination commenced:

F. If you or your *related persons* have *custody* of *client* funds or securities, how many *persons*, including, but not limited to, you and your *related persons,* act as qualified custodians for your *clients* in connection with advisory services you provide to *clients?*
0

SECTION 9.C. *Independent Public Accountant*

No Information Filed

Item 10 Control Persons

In this Item, we ask you to identify every *person* that, directly or indirectly, *controls* you. If you are filing an *umbrella registration*, the information in Item 10 should be provided for the *filing adviser* only.

If you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.

		Yes	No
A.	Does any *person* not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, *control* your management or policies?	●	○

If yes, complete Section 10.A. of Schedule D.

B. If any *person* named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please complete Section 10.B. of Schedule D.

SECTION 10.A. *Control Persons*

You must complete a separate Schedule D Section 10.A. for each *control person* not named in Item 1.A. or Schedules A, B, or C that directly or indirectly *controls* your management or policies.

Individual Name (if applicable) (Last, First, Middle)
GOLDSTEIN, PHILIP, ALAN

CRD Number (if any)
1031460

Effective Date	Termination Date
05/06/2016	

Business Address:

Number and Street 1		Number and Street 2	
116 NORTH STATE STREET		1ST FLOOR	
City	State	Country	ZIP+4/Postal Code
CLARK'S SUMMIT	Pennsylvania	United States	18411-1056

If this address is a private residence, check this box: ☐

Briefly describe the nature of the *control*:
PRESIDENT, BOARD OF DIRECTOR, CHIEF EXECUTIVE OFFICER, CHIEF INVESTMENT OFFICER

You must complete a separate Schedule D Section 10.A. for each *control person* not named in Item 1.A. or Schedules A, B, or C that directly or indirectly *controls* your management or policies.

Individual Name (if applicable) (Last, First, Middle)
Goldstein, Heath, Gary

CRD Number (if any)
2147679

Effective Date	Termination Date
05/19/2016	

Business Address:

Number and Street 1		Number and Street 2	
116 NORTH STATE STREET		1ST FLOOR	
City	State	Country	ZIP+4/Postal Code
CLARK'S SUMMIT	Pennsylvania	United States	18411-1056

If this address is a private residence, check this box: ☐

Briefly describe the nature of the *control*:

VICE-PRESIDENT; BOARD OF DIRECTOR; CHIEF COMPLIANCE OFFICER, CHIEF FINANCIAL OFFICER, CHIEF OPERATING OFFICER

You must complete a separate Schedule D Section 10.A. for each *control person* not named in Item 1.A. or Schedules A, B, or C that directly or indirectly *controls* your management or policies.

Firm or Organization Name

NE PA FINANCIAL GROUP

CRD Number (if any)

Effective Date	Termination Date
10/01/2016	

Business Address:

Number and Street 1		Number and Street 2	
116 NORTH STATE STREET		1ST FLOOR	
City	State	Country	ZIP+4/Postal Code
CLARK'S SUMMIT	Pennsylvania	United States	18411-1056

If this address is a private residence, check this box: ☐

Briefly describe the nature of the *control*:

SHAREOWNER OF FIRM

SECTION 10.B. *Control Person* Public Reporting Companies

No Information Filed

Item 11 Disclosure Information

In this Item, we ask for information about your disciplinary history and the disciplinary history of all your *advisory affiliates*. We use this information to determine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the *filing adviser* and all *relying advisers* under an *umbrella registration*.

Your *advisory affiliates* are: (1) all of your current *employees* (other than *employees* performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any *person* performing similar functions); and (3) all *persons* directly or indirectly *controlling* you or *controlled* by you. If you are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your *advisory affiliates* are.

If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.

You must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.

	Yes	No
Do any of the events below involve you or any of your *supervised persons*?	○	●

For "yes" answers to the following questions, complete a Criminal Action DRP:

	Yes	No
A. In the past ten years, have you or any *advisory affiliate*:		
(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any *felony*?	○	●
(2) been *charged* with any *felony*?	○	●

If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to charges that are currently pending.

	Yes	No
B. In the past ten years, have you or any *advisory affiliate*:		
(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a *misdemeanor* involving: investments or an *investment-related* business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury,	○	●

forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?		
(2) been *charged* with a *misdemeanor* listed in Item 11.B.(1)?	○	●

If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) to charges that are currently pending.

For "yes" answers to the following questions, complete a Regulatory Action DRP:

C. Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	**Yes**	**No**
(1) *found* you or any *advisory affiliate* to have made a false statement or omission?	○	●
(2) *found* you or any *advisory affiliate* to have been *involved* in a violation of SEC or CFTC regulations or statutes?	○	●
(3) *found* you or any *advisory affiliate* to have been a cause of an *investment-related* business having its authorization to do business denied, suspended, revoked, or restricted?	○	●
(4) entered an *order* against you or any *advisory affiliate* in connection with *investment-related* activity?	○	●
(5) imposed a civil money penalty on you or any *advisory affiliate*, or *ordered* you or any *advisory affiliate* to cease and desist from any activity?	○	●

D. Has any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority*:		
(1) ever *found* you or any *advisory affiliate* to have made a false statement or omission, or been dishonest, unfair, or unethical?	○	●
(2) ever *found* you or any *advisory affiliate* to have been *involved* in a violation of *investment-related* regulations or statutes?	○	●
(3) ever *found* you or any *advisory affiliate* to have been a cause of an *investment-related* business having its authorization to do business denied, suspended, revoked, or restricted?	○	●
(4) in the past ten years, entered an *order* against you or any *advisory affiliate* in connection with an *investment-related* activity?	○	●
(5) ever denied, suspended, or revoked your or any *advisory affiliate's* registration or license, or otherwise prevented you or any *advisory affiliate*, by *order*, from associating with an *investment-related* business or restricted your or any *advisory affiliate's* activity?	○	●

E. Has any *self-regulatory organization* or commodities exchange ever:		
(1) *found* you or any *advisory affiliate* to have made a false statement or omission?	○	●
(2) *found* you or any *advisory affiliate* to have been *involved* in a violation of its rules (other than a violation designated as a "*minor rule violation*" under a plan approved by the SEC)?	○	●
(3) *found* you or any *advisory affiliate* to have been the cause of an *investment-related* business having its authorization to do business denied, suspended, revoked, or restricted?	○	●
(4) disciplined you or any *advisory affiliate* by expelling or suspending you or the *advisory affiliate* from membership, barring or suspending you or the *advisory affiliate* from association with other members, or otherwise restricting your or the *advisory affiliate's* activities?	○	●

F. Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any *advisory affiliate* ever been revoked or suspended?	○	●
G. Are you or any *advisory affiliate* now the subject of any regulatory *proceeding* that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?	○	●

For "yes" answers to the following questions, complete a Civil Judicial Action DRP:

H. (1) Has any domestic or foreign court:	**Yes**	**No**
(a) in the past ten years, *enjoined* you or any *advisory affiliate* in connection with any *investment-related* activity?	○	●
(b) ever *found* that you or any *advisory affiliate* were *involved* in a violation of *investment-related* statutes or regulations?	○	●
(c) ever dismissed, pursuant to a settlement agreement, an *investment-related* civil action brought against you or any *advisory affiliate* by a state or *foreign financial regulatory authority*?	○	●
(2) Are you or any *advisory affiliate* now the subject of any civil *proceeding* that could result in a "yes" answer to any part of Item 11.H.(1)?	○	●

Item 12 Small Businesses

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

Answer this Item 12 only if you are registered or registering with the SEC **and** you indicated in response to Item 5.F.(2)(c) that you have regulatory assets under management of less than $25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from SEC to state registration.

For purposes of this Item 12 only:

- Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of *clients*. In determining your or another *person's* total assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).
- *Control* means the power to direct or cause the direction of the management or policies of a *person*, whether through ownership of securities, by contract, or otherwise. Any *person* that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent

or more of the profits, of another *person* is presumed to *control* the other *person*.

		Yes	No
A.	Did you have total assets of $5 million or more on the last day of your most recent fiscal year?	○	○

If "yes," you do not need to answer Items 12.B. and 12.C.

B. Do you:

		Yes	No
(1)	*control* another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of $25 million or more on the last day of its most recent fiscal year?	○	○
(2)	*control* another *person* (other than a natural person) that had total assets of $5 million or more on the last day of its most recent fiscal year?	○	○

C. Are you:

		Yes	No
(1)	*controlled* by or under common *control* with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of $25 million or more on the last day of its most recent fiscal year?	○	○
(2)	*controlled* by or under common *control* with another *person* (other than a natural person) that had total assets of $5 million or more on the last day of its most recent fiscal year?	○	○

Schedule A

Direct Owners and Executive Officers

1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
2. Direct Owners and Executive Officers. List below the names of:
   - (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer(Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
   - (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);
     Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
   - (c) if you are organized as a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
   - (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
   - (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
3. Do you have any indirect owners to be reported on Schedule B? ● Yes ○ No
4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
6. Ownership codes are:

NA - less than 5%	B - 10% but less than 25%	D - 50% but less than 75%
A - 5% but less than 10%	C - 25% but less than 50%	E - 75% or more

7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
   - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
   - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	**DE/FE/I**	**Title or Status**	**Date Title or Status Acquired MM/YYYY**	**Ownership Code**	***Control Person***	**PR**	***CRD* No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.**
GOLDSTEIN, PHILIP, ALAN	I	PRESIDENT, BOARD OF DIRECTOR, CHIEF INVESTMENT OFFICER & CHIEF EXECTIVE OFFICER	04/2016	NA	Y	N	1031460
Goldstein, Heath, Gary	I	VICE-PRESIDENT, BOARD OF DIRECTOR, CHIEF COMPLIANCE OFFICER, & CHIEF FINACIAL OFFICER, CHIEF OPERATING OFFICER	05/2016	NA	Y	N	2147679
NE PA FINANCIAL GROUP, CO.	DE	SHAREOWNER	10/2016	E	Y	N	

Schedule B

Indirect Owners

1. Complete Schedule B only if you are submitting an initial application or report. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
   - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.

   (b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;

   (c) in the case of an owner that is a trust, the trust and each trustee; and

   (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.

3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
6. Ownership codes are:
   C - 25% but less than 50%
   D - 50% but less than 75%
   E - 75% or more
   F - Other (general partner, trustee, or elected manager)
7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.

   (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.

   (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	**DE/FE/I**	**Entity in Which Interest is Owned**	**Status**	**Date Status Acquired MM/YYYY**	**Ownership Code**	***Control Person***	**PR**	***CRD* No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.**
1ST FINANCIAL INVESTMENTS, INC.	DE	HEATH GOLDSTEIN TRUST	TRUSTEE	12/2007	F	N	N	
HEATH GOLDSTEIN TRUST	DE	NE PA FINANCIAL GROUP, CO.	GENERAL PARTNER	10/2016	C	N	N	
PHILIP GOLDSTEIN TRUST	DE	NE PA FINANCIAL GROUP, CO.	GENERAL PARTNER	10/2016	D	N	N	
JORDAN GOLDSTEIN TRUST	DE	NE PA FINANCIAL GROUP, CO.	GENERAL PARTNER	10/2016	F	N	N	
GOLDSTEIN, HEATH, GARY	I	PHILIP GOLDSTEIN TRUST	CO-TRUSTEE	07/2004	F	Y	N	2147679
GOLDSTEIN, HEATH, GARY	I	JORDAN GOLDSTEIN TRUST	CO-TRUSTEE	07/2004	F	Y	N	2147679
Goldstein, Heath, Gary	I	1ST FINANCIAL INVESTMENTS, INC.	VICE-PRESIDENT, SECRETARY, TREASURER, CFO, COO	10/2004	F	Y	N	2147679
GOLDSTEIN, PHILIP, ALAN	I	PHILIP GOLDSTEIN TRUST	CO-TRUSTEE	07/2004	F	Y	N	1031460
GOLDSTEIN, PHILIP, ALAN	I	JORDAN GOLDSTEIN TRUST	CO-TRUSTEE	07/2004	F	Y	N	1031460
GOLDSTEIN, PHILIP, ALAN	I	1ST FINANCIAL INVESTMENTS, INC.	PRESIDENT, CEO	10/2004	F	Y	N	1031460
GOLDSTEIN, HEATH, GARY	I	HEATH GOLDSTEIN TRUST	BENEFICIARY	07/2004	E	Y	N	2147679
GOLDSTEIN, PHILIP, ALAN	I	PHILIP GOLDSTEIN TRUST	BENEFICIARY	07/2004	E	Y	N	1031460
Goldstein, Jordan, Joel	I	JORDAN GOLDSTEIN TRUST	BENEFICIARY	07/2004	E	N	N	6616735
PASTERNAK, CHERYL, A.	I	NE PA FINANCIAL GROUP, CO.	LIMITED PARTNER	01/2024	F	N	N	1423857

Schedule D - Miscellaneous

You may use the space below to explain a response to an Item or to provide any other information.

1st Financial Investment, Inc. is a totally separate legal entity and is not in any way shape and/or form owned by and/or controlled by 1st Financial Investments, Inc., 1st Financial Safeguard, Co., 1st Financial Services, Co. and/or 1st Financial Tax Services, LLC. and/or any of their respective affiliates, subsidiaries, and/or their other fictitious DBA names that may be used under those respective entities. However, 1st Financial Investment Inc may be deemed to be affiliated with these other entities as NEPA Financial Group, Co. is the direct shareowner, parent & holding company of 1st Financial Investment, Inc. is also a direct shareowner of 1st Financial Investments, Inc., 1st Financial Safeguard, Co., 1st Financial Services, Co., and 1st Financial Tax Services, Co. However, 1st Financial Investment Inc. operates separately and independently from the other entities and/or their respective affiliates, subsidiaries, and/or any DBA fictitious names that is owned by its parent and holding company, NEPA Financial Group, Co. Galat & Company, AG Consulting LLC, and J Gold Consulting are a Doing Business As name for Advisory Affiliates of 1st Financial Investment, Inc. who are all also CPA's. Galat & Company, AG Consulting LLC, and J Gold Consulting are all totally separate legal entities and is not in any way shape and/or form affiliated with, owned by, and/or controlled by 1st Financial Investment, Inc., 1st Financial Investments, Inc., 1st Financial Tax Services, Co, 1st Financial Safeguard, Co., 1st Financial Services, Co., NEPA Financial Group Co, and/or any of their respective direct and/or indirect shareowners, subsidiaries, affiliates, and/or other fictitious DBA names that may be used under those respective entities. There is no direct contract engagement by and between Galat & Company, AG Consulting LLC, and/or J Gold Consulting and 1st Financial Investment, Inc., 1st Financial Investments, Inc., 1st Financial Tax Services, LLC, 1st Financial Safeguard, Co., 1st Financial Services, Co., NEPA Financial Group Co, and/or any of their respective direct and/or indirect shareowners, subsidiaries, affiliates, and/or other fictitious DBA names that may be used under those respective entities. Vestech Securities, Inc and Vestech Asset Management are both totally legal separate entities and is in no way shape and/or form affiliated with, controlled by, and/or controlled by 1st Financial Investment, Inc., 1st Financial Investments, Inc., 1st Financial Tax Services, Co, 1st Financial Safeguard, Co., 1st Financial Services, Co., NEPA Financial Group Co, and/or any of their respective direct and/or indirect shareowners, subsidiaries, affiliates, and/or other fictitious DBA names that may be used under those respective entities. There is no direct contract engagement by and between Vestech Securities, Inc., Vestech Asset Management, Inc., 1st Financial Investment, Inc., 1st Financial Investments, Inc., 1st Financial Tax Services, LLC, 1st Financial Safeguard, Co., 1st Financial Services, Co., NEPA Financial Group Co, and/or any of their respective direct and/or indirect shareowners, subsidiaries, affiliates, and/or other fictitious DBA names that may be used under those respective entities. In 2023 our firm changed qualified Custodians from Western International Securities Inc (WIS) to SEI Private Trust Company (SEI). As of January 2024, our firm no longer had any access to any accounts at WIS and any of their clearing firms' platforms. Any client that didn't sign the necessary paperwork to move their asset to SEI were notified as such and had their management agreement by our firm terminated. WIS Parent Company as that time was Atria Wealth Advisors (Atria). Atria has since been sold, bought by, and merged with LPL Financial (LPL). In June 2025 LPL has begun the conversion of all of WIS accounts and operations to their platform as LPL is self clearing. On August 11, 2025, WIS filed with FINRA and the SEC to formally withdrawal as a FINRA member US SEC broker/dealer, to which such request was granted. It is unknown when WIS Corporate Charter will be dissolved. WIS former clearing firms by regulation requirement will retain any and all client information including but not limited to personal information, securities held, trading activity, and statements during the period of time WIS was our qualified custodian and while client accounts were with them. The clearing firms will purge all information after the required retention time frame as pursuant to regulations of the United States Securities Exchange Commission (SEC), the Financial Industry Regulation Authority (FINRA), and the various States and/or Commonwealth's requirements. LPL may continue to retain client's information pursuant to FINRA, US SEC, and various states and/or Commonwealth's requirements. Clients will no longer be able to contact WIS or Atria if they need any information regarding their past account during the time frame their account was held with them and/or their clearing firms. Clients may attempt to contact LPL for any information regarding their account during the time it was with WIS, until such time as information is purges. It is unknown if LPL will have any information prior to them purchasing WIS and Atria. Vere Global Asset Management (Vere) used to be one of the firm's sub-advisors and provided portfolio management for client's accounts on the firm's behalf. In August 2025, Vere filed Form ADV-W to withdrawal as an Investment Advisory firm, such request was granted. Its Corporate Charter has been dissolved and retired June 2026. Vere's President will be required to maintain client's information pursuant to the regulations of the client's resident state and Vere's home state. Information will be purged and destroyed upon completion of the retention period as required by the greater of either the client's resident state or Vere's home state.

Schedule R

No Information Filed

DRP Pages

CRIMINAL DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

Arbitration DRPs

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☐ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☐ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number: 1031460

This *advisory affiliate* or *management person* is ○ a Firm ● an Individual

Registered: ● Yes ○ No

Name: GOLDSTEIN, PHILIP, ALAN
(For individuals, Last, First, Middle)

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
EDITH COSSLET

2. Principal Relief Sought: (Check appropriate item)
Other
Other Relief Sought:
LOSS OF PRINCIPAL

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
11/08/1995 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Mutual Fund(s)
Other Product Types:

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
NASD (NOW KNOWN AS FINRA) 95-5247

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
MERRILL LYNCH, PIERCE, FENNER, & SMITH, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
MISREPRESENTATION, SUITABILITY, OMISSIONS OF FACTS, ACCOUNT RELATED FAILURE TO SUPERVISE

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):

○ Exact ○ Explanation

If not exact, provide explanation:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):

Settled

12. Resolution Date (MM/DD/YYYY):

03/21/1996 ● Exact ○ Explanation

If not exact, provide explanation:

13. Resolution Detail:

A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount:	$
☑ Settlement	Amount:	$ 17,500.00
☐ Disgorgement/Restitution	Amount:	$
☐ Injunction		

B. Other Sanctions:

C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:

CASE WAS SETTLED, AND CLIENT WITHDREW HER CLAIM AGAINST REP, MANAGER, AND BROKER/DEALER

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)

THE COMPLAINT MADE BY THE CLIENT WAS MADE AGAINST ADVISOR AFFILIATE, HIS BRANCH MANAGER AT THE TIME, AND MERRILL LYNCH (M/L) AFTER HE LEFT THE FIRM. IT IS BELIEVED BY THE ADVISOR THAT BECAUSE HE WAS NO LONGER EMPLOYED BY M/L AT THE TIME THE COMPLAINT WAS SERVED THAT THEY CHOOSE TO SETTLE RATHER THAN TO DEFEND IT. ADVISOR AFFILIATE BELIEVES THAT THE COMPLAINT WAS DUE TO A PRODUCT ISSUE AND TO HIS KNOWLEDGE WAS NOT A SUITABILITY OR SALES PRACTICE ISSUE. THE ADVISOR AFFILIATE DID NOT PARTICIPATE IN ANY PART OF THE SETTLEMENT DECISION NOR WAS HE REQUIRED TO CONTRIBUTE PERSONALLY ANY OF THE AMOUNT SETTLED BY M/L. THE CLIENT HAS SINCE PASSED AWAY

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☐ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☐ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).

If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	1031460	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	GOLDSTEIN, PHILIP, ALAN (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
EDWARD & RUTH GRONKA TO PRUDENTIAL SECURITIES

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
09/08/1994 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Direct Investment(s) - DPP & LP Interest(s)
Other Product Types:

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
NASD (NOW KNOWN AS FINRA) 94-1961

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
PRUDENTIAL SECURITIES, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
UNSUITIBLE RECOMMENDATIONS OF LIMITED PARTNERSHIPS. ALLEGATIONS WERE MADE AGAINST FIRM, NOT AGAINST ADVISOR AFFILIATE. HOWEVER ADVISOR AFFILIATE WAS REP OF RECORD

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
○ Exact ○ Explanation
If not exact, provide explanation:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
01/17/1996 ● Exact ○ Explanation
If not exact, provide explanation:

13. Resolution Detail:
    A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 19,000.00
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

B. Other Sanctions:

C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
CLIENT WITHDREW THEIR CLAIM AND ACCEPTED A SETTLEMENT THROUGH PRUDENTIAL SECURITIES LIMITED PARTNERSHIP SETTLEMENT PROCESS

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
A SETTLEMENT HAD BEEN REACHED WITH THE CLIENT IN THE SETTLEMENT CLAIMS RESOLUTION PROCESS THAT OCCURRED IN 1993 THAT RESOLVED ALL THE CLAIMS DURING THAT TIME. THE MATTER RESULTED FROM THE UNSOLICITED MAILING AND FILING OF RESOLUTION CLAIM FORMS BY PRUDENTIAL SECURITIES INC. (PSI) (NOW KNOWN AS WELLS FARGO ADVISORS BY MERGER) AROUND THAT TIME FRAME PSI PLEADED GUILTY TO CRIMINAL WRONGDOING THAT THROUGH THEIR UNIFORM SALES PRACTICE AND LITERATURE FALSELY INSTRUCTED THAT THE LIMITED PARTNERS SOLD WERE SAFE AND LOW RISK, AND SUITABLE FOR INVESTORS WHO INVESTMENT OBJECTIVE WAS SAFETY OF PRINCIPAL. (SEE DOCKET US DISTRICT COURT DISTRICT OF COLUMBIA # 93-CV-2163 U.S. SECURITY EXCHANGE COMMISSION VERSUS PRUDENTIAL SECURITIES INC.) THE CLIENT SUBMITTED CLAIMS FORMS THROUGH THE CLAIMS RESOLUTION PROCESS AND WERE EVALUATED AND PROCESSED THROUGH THE SETTLEMENT MADE BETWEEN THE SEC, NASD (NOW KNOWN AS FINRA), AND THE VARIOUS STATE SECURITY ADMINISTRATORS. THE REPORTED SETTLEMENT AROSE OUT OF THESE UNIQUE PROCESS. THE CLIENTS ORIGINALLY FILED THEIR ARBITRATION CLAIM PRIOR TO THE MAILING OF THE CLAIM FORMS. THE CLIENTS WITHDREW THEIR ARBITRATION CLAIM AND SETTLED THROUGH THE CLAIMS RESOLUTION PROCESS. ADVISOR AFFILIATE DID NOR PARTICIPATE IN ANY PART OF THE EVALUATION OF THE SETTLEMENT, NOR WAS REQUIRED TO CONTRIBUTE PERSONALLY TOWARD THE SETTLEMENT. THE INDUSTRY HAS GENERALLY CLASSIFIED ALL THESE CLAIMS AND ANY PUBLIC DRP DISCLOSURES ASSOCIATED WITH THEM AS ONE EVENT

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☑ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☑ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

● You and one or more of your *advisory affiliates* or *management persons*

○ One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number: 2147679
Registered: ● Yes ○ No
Name: GOLDSTEIN, HEATH, GARY (For individuals, Last, First, Middle)
This *advisory affiliate* or *management person* is ○ a Firm ● an Individual

CRD Number: 283072
Registered: ● Yes ○ No
Name: 1ST FINANCIAL INVESTMENT, INC. (For individuals, Last, First, Middle)
This *advisory affiliate* or *management person* is ● a Firm ○ an Individual

CRD Number: 1031460
This *advisory affiliate* or *management person* is ○ a Firm ● an Individual

Registered: ● Yes ○ No

Name: GOLDSTEIN, PHILIP, ALAN
(For individuals, Last, First, Middle)

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
JEAN GONTARSKI

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:
COMPENSATORY DAMAGES; PRE & POST ARBITRATION AWARD INTEREST; PUNITIVE OR EXEMPLARY DAMAGES; ATTORNEY FEES; FILING FEES, AND OTHER RELIEF AS PANEL DEEMS JUST AND PROPER

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
02/13/2018 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Direct Investment(s) - DPP & LP Interest(s)
Other Product Types:

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA 18-411

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
BERTHEL FISHER & COMPANY FINANCIAL SERVICES, INC. KALOS CAPITAL, INC. KALOS MANAGEMENT, INC. KALOS FINANCIAL, INC. CALTON & ASSOCIATES, INC. PALOMAR FINANCIAL SERVICES, INC. 1ST FINANCIAL INVESTMENTS, INC. 1ST FINANCIAL INVESTMENT, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
UNSUITABILITY OF OIL & GAS DRILLING PROGRAM LIMITED PARTNERSHIP, LAKE OF SUPERVISION, COMPENSATORY DAMAGES, VIOLATIONS OF THE SECURITIES ACT OF 1934 (VIOLATIONS OF SECTIONS 10(B) AND 20(A) OF THE 1934 ACT [15 U.S.C. 78J(B) AND 78T(A)] AND RULE 10B-5 THEREUNDER [17 C.F.R. 240.10B-5); VIOLATIONS OF THE PENNSYLVANIA UNFAIR TRADE PRACTICES AND CONSUMER PROTECTION LAW [73 P.S. 1-201 ET SEQ.]; VIOLATIONS OF THE PENNSYLVANIA SECURITIES ACT OF 1972, 70 P.S. 1-101 ET SEQ.; BREACH OF FIDUCIARY DUTY; COMMON LAW FRAUD; NEGLIGENCE; BREACH OF CONTRACT; PUNITIVE DAMAGES

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
02/16/2018 ● Exact ○ Explanation
If not exact, provide explanation:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
06/25/2018 ● Exact ○ Explanation
If not exact, provide explanation:

13. Resolution Detail:
   A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?
      ☐ Monetary Award Amount: $

☑ Settlement Amount: $ 51,000.00

☐ Disgorgement/Restitution Amount: $

☐ Injunction

B. Other Sanctions:
WITHDRAWAL WITH PREJUDICE AGAINST FIRM AND ADVISORY AFFILIATES.

C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
ADVISORY AFFILIATES BROKER/DEALER SETTLED THE MATTER WITH CLIENT. THERE WAS NO INDIVIDUAL CONTRIBUTION BY ANY OF THE ADVISORY AFFILIATES. THE ADVISORY FIRM DID NOT CONTRIBUTE TO ANY PART OF THE SETTLEMENT AS THE FIRM WAS NOT REQUIRED TO DISPUTE AND ARGUE THE MATTER BEFORE THE FINRA ARBITRATION PANEL, AND THEREFORE OPTED OUT. THE SETTLEMENT AGREEMENT CLIENT SIGNED ALSO REQUIRED THAT THE CLIENT DISMISS AND WITHDRAWAL THE MATTER WITH PREJUDICE AGAINST THE ADVISORY FIRM AND ADVISORY AFFILIATES.

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
CLAIMANT NAMED ADVISORY FIRM AS RESPONDENTS TO THIS STATEMENT OF CLAIM. THIS FIRM WASN'T IN EXISTENCE AT THE TIME INVESTMENTS WERE PURCHASED. FURTHER, CLAIMANT ISN'T & NEVER BECAME A CLIENT OF THIS FIRM. THIS FIRM WASN'T IN EXISTENCE AT THE TIME OF THE ACTIONS, NOR SOLD ANY OF THESE PRODUCTS. FIRM ISN'T MANDATORY REQUIRED TO DISPUTE AND/OR ARGUE BEFORE FINRA. FIRM OPTED OUT TO DISPUTE BEFORE FINRA. CLAIMANT WAS A CLIENT OF BOTH ADVISORY AFFILIATES. HOWEVER THE INVESTMENTS WERE SOLD BY ADVISORY AFFILIATE PHIL GOLDSTEIN AT ALL TIMES AT BERTHEL FISHER & KALOS CAPITAL. ADVISORY AFFILIATE HEATH GOLDSTEIN WAS SERIES 11 LICENSED & DIDN'T SELL, NOR WAS ABLE TO SELL THESE PRODUCTS AT THE TIME THEY WERE SOLD. HIS ONLY INVOLVEMENT AT THE TIME WITH BERTHEL FISHER AND KALOS CAPITAL WAS ADMINISTRATIVE IN FILLING OUT & PROCESSING THE PAPERWORK. HEATH GOLDSTEIN TOOK OVER THE & SERVICED THE ACCOUNT AT THE TIME OF THE MOVE TO CALTON & ASSOCIATES. PHILIP GOLDSTEIN DIDN'T MOVE TO CALTON & ASSOCIATES. THE MATTER AGAINST HEATH GOLDSTEIN WILL BE VIGOROUSLY DEFENDED AS HE DIDN'T SELL ANY OF THESE PRODUCTS & MERELY SERVICED THE CLAIMANT'S ACCOUNT. THE RESPONDENTS TO THIS CLAIM IS THIS FIRM, ADVISORY AFFILIATES, HEATH & PHILIP GOLDSTEIN, BERTHEL FISHER & COMPANY FINANCIAL SERVICES, INC; KALOS CAPITAL, INC, AND CALTON & ASSOCIATES, INC. KALOS MANAGEMENT, INC WASN'T NAMED, BUT ADVISORY AFFILIATE PHILIP GOLDSTEIN WAS ALSO AFFILIATED WITH THEM AT THAT TIME. KALOS FINANCIAL, INC IS THE PARENT COMPANY OF BOTH KALOS CAPITAL AND KALOS MANAGEMENT. PALOMAR FINANCIAL SERVICES, INC. WASN'T NAMED AS A PARTY BUT ADVISORY AFFILIATE HEATH & PHILIP GOLDSTEIN WAS AFFILIATED WITH THEM. ADVISORY AFFILIATES HEATH & PHILIP GOLDSTEIN BROKER/DEALERS SETTLED THE MATTER WITH THE CLIENT WITHOUT ANY INDIVIDUAL CONTRIBUTION FROM THE ADVISORY AFFILIATES SETTLEMENT AGREEMENT ALSO DISMISSED THE MATTER WITH PREJUDICE AGAINST FIRM AND ADVISORY AFFILIATES INDIVIDUALLY.

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☐ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☐ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number: 1031460

This *advisory affiliate* or *management person* is ○ a Firm ● an Individual

Registered: ● Yes ○ No

Name: GOLDSTEIN, PHILIP, ALAN
(For individuals, Last, First, Middle)

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
LAWRENCE & DEBRA FRANKO

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
11/07/2018 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Direct Investment(s) - DPP & LP Interest(s)
Other Product Types:
OIL & GAS

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA 18-38855

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
KALOS CAPITAL, INC KALOS MANAGEMENT, INC. KALOS FINANCIAL INC. 1ST FINANCIAL INVESTMENTS, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
LACK OF DUE DILIGENCE AND NEGLIGENCE

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
● Exact ○ Explanation
If not exact, provide explanation:
ADVISORY AFFILIATE WAS NOT SERVED A COPY OF THE COMPLAINT AS HE WAS NOT NAMED A RESPONDENT. THE DATE LISTED IS THE DATE THE BROKER / DEALER WAS OFFICIALLY SERVED WITH THE COMPLAINT.

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
11/12/2018 ● Exact ○ Explanation
If not exact, provide explanation:
DATE PRIOR BROKER / DEALER SETTLED THE MATTER

13. Resolution Detail:
    A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 22,000.00
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

    B. Other Sanctions:
    C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
SETTLEMENT PAID BY ADVISORY AFFILIATE FORMER BROKER / DEALER. ADVISORY AFFILIATE DID NOT PARTICIPATE IN ANY OF THE SETTLEMENT

NEGOTIATIONS, NOR CONTRIBUTED ANY INDIVIDUAL FUNDS TOWARDS THE SETTLEMENT

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
ADVISORY AFFILIATE WAS NOT LISTED AS A NAMED RESPONDENT, NOR WAS ADVISORY AFFILIATE'S NAME LISTED ANYWHERE IN THE MERITS OF THE COMPLAINT. THE CAPTIONED OF THE COMPLAINT IS THE CLIENT VERSUS THE BROKER / DEALER ONLY. ADVISORY AFFILIATE WAS THE REPRESENTATIVE OF RECORD ON THE PARTICULAR INVESTMENT THAT HE FILED HIS COMPLAINT CLAIM. KALOS CAPITAL, INC. WAS THE ADVISORY AFFILIATE'S BROKER/DEALER. ALTHOUGH NOT NAMED AS A RESPONDENT, KALOS MANAGEMENT WAS THE RIA FIRM THAT ADVISORY AFFILIATE WAS ALSO AFFILIATED WITH AND ALSO NOT NAMED AS A RESPONDENT, KALOS FINANCIAL, INC. IS THE PARENT AND HOLDING COMPANY OF BOTH KALOS CAPITAL, INC. AND KALOS MANAGEMENT, INC., ALSO NOT NAMED AS A RESPONDENT, 1ST FINANCIAL INVESTMENTS, INC. WAS THE DBA THAT WAS USED BY ADVISORY AFFILIATE FOR HIS SECURITIES & RIA BUSINESS AT THAT TIME -- ADVISORY AFFILIATE FORMER BROKER / DEALER, KALOS CAPITAL SETTLED THE MATTER BETWEEN THE CLIENTS. THE ADVISORY AFFILIATE DID NOT CONTRIBUTE TO ANY PART OF THE SETTLEMENT AGREEMENT AND HAD NO PARTICIPATION IN REACHING THE SETTLEMENT AGREEMENT

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☐ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☐ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	2147679	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	GOLDSTEIN, HEATH, GARY (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
LEONARD AND NANCY MAHLE

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:
REIMBURSEMENT OF SURRENDER CHARGES ON THREE (3) EQUITY INDEX ANNUITIES; AMOUNT OF UNREALIZED LOSS ON TWO (2) REAL ESTATE INVESTMENT TRUSTS, PRE & POST AWARD INTEREST COSTS, FILING FEES, ATTORNEY FEES, AND ANY OTHER RELIEF PANEL DEEMS JUST AND PROPER

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):

   11/11/2019 ● Exact ○ Explanation
   If not exact, provide explanation:

4. Principal Product Type:
   Direct Investment(s) - DPP & LP Interest(s)
   Other Product Types:
   REAL-ESTATE INVESTMENT TRUST EQUITY INDEX ANNUITY

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
   FINRA 19-3278

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
   CALTON & ASSOCIATES, INC. PALOMAR FINANCIAL SERVICES INC SIMPLICITY LIFE (F/K/A IMERITI FINANCIAL NETWORK & INSURANCE SALES BY MERGER) 1ST FINANCIAL INVESTMENTS, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
   VIOLATIONS OF (1) SECTIONS 10(B) AND 20(A) OF THE 1934 ACT [15 U.S.C. 78J(B) AND 78T(A)] AND RULE 10B-5 THEREUNDER [17 C.F.R. 240.10B-5]; (2) SECTIONS 12 OF THE 1933 ACT; (3) PENNSYLVANIA UNFAIR TRADE PRACTICES AND CONSUMER PROTECTION LAW [73 P.S. 1-201 ET SEQ.]; AND (4) PENNSYLVANIA SECURITIES ACT OF 1972, 70 P.S. 1-101 ET SEQ. BREACH OF FIDUCIARY DUTY; COMMON LAW FRAUD; NEGLIGENCE - FAILURE TO SUPERVISE; AND BREACH OF CONTRACT

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):

    ○ Exact ○ Explanation
    If not exact, provide explanation:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
    Settled

12. Resolution Date (MM/DD/YYYY):

    12/03/2019 ● Exact ○ Explanation
    If not exact, provide explanation:

13. Resolution Detail:
    A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 38,199.99
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

    B. Other Sanctions:
    C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
    ADVISORY AFFILIATE FORMER BROKER / DEALER SETTLED FOR $24,499.99 AND ADVISORY AFFILIATE SETTLED INDIVIDUALLY FOR $13,200.00. HOWEVER ADVISORY AFFILIATE PORTION WAS PAID FOR BY HIS GENERAL AGENCY OF THE ANNUITY PRODUCTS, 1ST FINANCIAL INVESTMENTS THAT ADVISORY AFFILIATE DENIES ALL CLAIMS. ADVISORY AFFILIATE FORMER BROKER / DEALER CALTON & ASSOCIATE WOULDN'T SETTLE FOR A PENNY MORE, AND LEFT ADVISORY AFFILIATE TO SETTLE WITH HIS OWN FUNDS TO AVOID ADDITIONAL OUT OF POCKET EXPENSE WHICH WOULD HAVE COST MORE TO DEFEND.

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
    THIS ARBITRATION LAWSUIT HAS ABSOLUTELY NO MERIT. LAWSUIT IS THE RESULT OF THESE CLIENTS PURCHASE OF 2 ALTERNATIVE INVESTMENT REAL ESTATE INVESTMENT TRUSTS AND 3 EQUITY INDEX ANNUITIES. CLIENT DID NOT WANT TO BE IN THE STOCK MARKET AND ATTENDED A SEMINAR WORKSHOP ON BOTH THE REIT AND ANNUITY INVESTMENTS. CLIENT SIGNED VARIOUS DISCLOSURES AND DOCUMENTS UNDERSTANDING THE REIT AND ANNUITIES AND THAT THESE INVESTMENTS MET THEIR FINANCIAL OBJECTIVES AND GOALS. OF THE 3 ANNUITY PRODUCTS IN THIS COMPLAINT, ADVISORY AFFILIATE ONLY SOLD 2 OF THEM. THE 3RD ADVISORY AFFILIATE WASN'T EVEN THE PRODUCER OR WRITING AGENT AND DOES NOT KNOW WHY HE IS BEING HELD LIABLE AND RESPONSIBLE FOR THIS ONE ANNUITY PRODUCT AND WHY IT IS HIS FAULT WHEN HE WASN'T INVOLVED IN ANY OF THE SALES PRESENTATION. ADVISORY AFFILIATE CLAIMS THAT THIS ENTIRE LAWSUIT WILL BE VIGOROUSLY DEFENDED. IN ADDITION TO ADVISORY AFFILIATE, AS A DEFENDANT HIS FORMER BROKER / DEALER, CALTON & ASSOCIATES WAS ALSO NAMED JOINTLY AND SEVERELY. DURING THIS OCCURRENCE ADVISORY AFFILIATE WAS ALSO AFFILIATED WITH PALOMAR FINANCIAL SERVICE AND IMERITI INSURANCE (NOW KNOWN AS SIMPLICITY

LIFE AS SUCCESSOR BY MERGER) THOUGH NOT NAMED AS A PARTY TO THIS ARBITRATION, THEY WERE BOTH THE UPLINE FMO/IMO/MGA/BGA FOR ANNUITIES PART OF THE ALLEGATIONS THAT OCCURRED. 1ST FINANCIAL INVESTMENTS THOUGH NOT NAMED AS A PARTY TO THIS ARBITRATION COMPLAINT, WAS THE GENERAL INSURANCE AGENCY ON ANNUITY PART OF THE ALLEGATIONS THAT OCCURRED AND THE D/B/A THAT ADVISORY AFFILIATE USES FOR HIS SECURITIES BUSINESS. -- SETTLEMENT AGREEMENT HAS BEEN REACHED BY AND BETWEEN ADVISORY AFFILIATE, HIS FORMER BROKER / DEALER CALTON & ASSOCIATE AND THE CLIENT TO AVOID ADDITIONAL OUT OF POCKET COST TO DEFEND THIS MATTER. ADVISORY AFFILIATE DENIES ALL CLAIMS. CLIENT DISMISSED AND WITHDRAWAL THE MATTER WITH PREJUDICE AGAINST ADVISORY AFFILIATE AND HIS BROKER / DEALER.

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☐ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☑ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number: 6013034 This *advisory affiliate* or *management person* is ○ a Firm ● an Individual

Registered: ● Yes ○ No

Name: DILLON, MICHAEL, FRANCIS (For individuals, Last, First, Middle)

CRD Number: 2147679 This *advisory affiliate* or *management person* is ○ a Firm ● an Individual

Registered: ● Yes ○ No

Name: Goldstein, Heath, Gary (For individuals, Last, First, Middle)

CRD Number: 1031460 This *advisory affiliate* or *management person* is ○ a Firm ● an Individual

Registered: ● Yes ○ No

Name: GOLDSTEIN, PHILIP, ALAN (For individuals, Last, First, Middle)

CRD Number: This *advisory affiliate* or *management person* is ● a Firm ○ an Individual

Registered: ○ Yes ● No

Name: 1ST FINANCIAL INVESTMENTS INC. (For individuals, Last, First, Middle)

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
CHARLES PERRELLA

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:
NET LOSS OF CURRENT INVESTMENT; LOSS OF POTENTIAL INVESTMENT OPPORTUNITIES; SURRENDER FEES; PRE & POST ARBITRATION AWARD INTEREST; FILING FEE; AND ATTORNEY FEES

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
06/17/2022 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Annuity(ies) - Fixed
Other Product Types:
EQUITY INDEX ANNUITY; NON-TRADED PREFERRED STOCK

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA 22-1365

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
1ST FINANCIAL INVESTMENTS, INC. 1ST FINANCIAL INVESTMENT, INC. 1ST FINANCIAL SAFEGUARD, CO. WESTERN INTERNATIONAL SECURITIES, INC. (HEATH GOLDSTEIN ONLY)

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
VIOLATIONS OF SECTIONS 10(B) AND 20(A) OF THE 1934 ACT [15 U.S.C. 78J(B) AND 78T(A)] AND RULE 10B-5 THEREUNDER [17 C.F.R. 240.10B-5; VIOLATIONS OF THE PENNSYLVANIA UNFAIR TRADE PRACTICES AND CONSUMER PROTECTION LAW [73 P.S. 1-201 ET SEQ.]; VIOLATIONS OF THE PENNSYLVANIA SECURITIES ACT OF 1972, 70 P.S. 1-101 ET SEQ.; BREACH OF FIDUCIARY DUTY; COMMON LAW FRAUD; NEGLIGENCE

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
06/28/2022 ● Exact ○ Explanation
If not exact, provide explanation:
SERVED ONLY TO NAMED RESPONDENT. ADVISORY FIRM, OR ADVISORY AFFILIATES WERE NOT SERVED.

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
05/11/2023 ● Exact ○ Explanation
If not exact, provide explanation:

13. Resolution Detail:
   A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 30,000.00
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

   B. Other Sanctions:
   C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:

SETTLEMENT SOLEY PAID BY WESTERN INTERNATIONAL SECURITIES. NO PERSONAL FUNDS CONTRIBUTED TOWARDS SETTLEMENT. AFFILIATES DIDN'T PARTICIPATE AND/OR PROVIDE ANY INPUT TOWARDS THE SETTLEMENT.

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
THIS ARBITRATION LAWSUIT IS NO MERIT. CLIENT ATTENDED A WORKSHOP THAT WAS ON ANNUITIES. CLIENT THEN MET IN OFFICE WITH PHILIP AND ANOTHER INSURANCE AGENT THAT WAS IN OUR OFFICE AT THAT TIME.(MIKE). AN INDEX ANNUITY WAS PRESENTED TO CLIENT AS HE HAD A VARIABLE ANNUITY AND DIDN'T WANT MARKET RISK. PART OF THE ANNUITY WAS 1035 EXCHANGE. CLIENT WAS AWARE OF THE SURRENDER FEES, CAPS, AND SPREAD. CLIENT DECIDED ON THE RECOMMENDATION AND AN APPLICATION WAS FILLED OUT, AND INCLUDED DISCLOSURES ON SURRENDER FEES, CAPS, AND SPREADS, AND SUITABILITY. THE EXCHANGE WOULDN'T HAVE BEEN PROCESSED AND SENT TO THE CONTRA CARRIER IF THE NEW CARRIER DIDN'T APPROVE THE APPLICATION AND SUITABILITY. PHILIP WASN'T THE PRODUCER OR WRITING AGENT OF THE ANNUITY. THAT AGENT HAS SINCE LEFT OUR OFFICE. IF THERE WAS ANY QUESTION ON SUITABILITY, CAPS, SPREADS, OR THE PRODUCT THE TIME FOR THE CLIENT TO ASK WAS WHEN THE APPLICATION WAS TAKEN AND SIGNED, AND NOT SOME 5 YEARS LATER. CLIENT NEVER ONCE IN THE 5 YEAR EVER COMPLAINED TO OUR OFFICE ON THE ANNUITY PRODUCT. CLIENT WAS REFERRED TO HEATH WHO WAS THE SERIES 7 REGISTERED REPRESENTATIVE FOR GWG PREFERRED EQUITY WHO PRESENTED THE APPROVED SALES MATERIALS TO THE CLIENT. CLIENT UNDERSTOOD THE PRODUCT WAS NON-TRADED, AND THE POTENTIAL RISKS. CLIENT ALSO SIGNED DISCLOSURES AND SUBSCRIPTION DOCUMENTATION WHICH ALSO MENTIONED THE RISKS THAT THE CLIENT AGREED TO. GWG HAS FILED FOR CHAPTER 11 BANKRUPTCY, AND GWG STOPPED PAYING THEIR DIVIDENDS IN CASH AND INSTEAD IS PAYING IN STOCK. IT IS BELIEVE THAT IS WHY THE CLIENT NOW IS INITIATING THIS LAWSUIT. NEITHER ADVISORY AFFILIATES OR ANY OF THE AFFILIATE COMPANIES WERE LISTED OR NAMED AS A RESPONDENT IN THE ARBITRATION LAWSUIT. WESTERN INTERNATIONAL SECURITIES WAS THE ONLY NAMED RESPONDENT. ONLY HEATH WAS AFFILIATED WITH WESTERN INTERNATIONAL SECURITIES. _________ WESTERN INTERNATIONAL SECURITIES SETTLED THIS MATTER TO AVOID ADDITIONAL COST AND CLIENT DISMISSED THE MATTER WITH PREJUDICE.

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☐ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☐ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	2147679	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	Goldstein, Heath, Gary (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)

MARK YOUNG

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
07/06/2022 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Debt - Corporate
Other Product Types:
DPP -- ALTERNATIVE INVESTMENT

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA 22-1514

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
WESTERN INTERNATIONAL SECURITIES, INC.; 1ST FINANCIAL INVESTMENT, INC; 1ST FINANCIAL INVESTMENTS, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
INITIALLY CLIENT WROTE A LETTER TO ADVISOR AFFILIATE REGARDING HIS INVESTMENT IN GWG HOLDINGS INQUIRING WHY HE WAS NEVER CONTACTED WHEN GWG SUSPENDED THEIR INTEREST PAYMENTS. CLIENT FURTHER ALLEGED THAT INVESTMENT WAS PRESENTED TO THEM AS A VERY SAFE INVESTMENT. SINCE THERE WAS NO ACTION ON THE WRITTEN COMPLAINT, CLIENT FILED AN ARBITRATION LAWSUIT FOR DAMAGES AND RECOVERY OF INVESTMENT INCLUDING VIOLATIONS OF SECTIONS 10(B) AND 20(A) OF THE 1934 ACT [15.USC 78J(B) AND 78T(A)] AND RULE 10B-5 THEREUNDER [17 CFR 240 10B-5]; VIOLATION OF THE COMMONWEALTH OF PENNSYLVANIA UNFAIR TRADE PRACTICES AND PROTECTION LAW [73 PS 1-201 ET SEQ.]; VIOLATIONS OF THE COMMONWEALTH OF PENNSYLVANIA SECURITIES ACT OF 1972 [70 PS 1-101 EQ SEQ.]; BREACH OF FIDUCIARY DUTY; COMMON LAW FRAUD; NEGLIGENCE; FAILURE TO SUPERVISE; AND BREACH OF CONTRACT

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
07/07/2022 ● Exact ○ Explanation
If not exact, provide explanation:
ABOVE DATE WAS SERVED TO BROKER/DEALER FIRM

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
06/14/2023 ● Exact ○ Explanation
If not exact, provide explanation:

13. Resolution Detail:

A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 40,000.00
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

B. Other Sanctions:

C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
SETTLEMENT WAS MADE SOLY BY ADVISORY AFFILIATE'S BROKER / DEALER. ADVISORY AFFILIATE NOR RIA FIRM PARTICIPATED IN ANY SETTLMENT DISCUSSIONS, OR CONTRIBUTIONS.

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
CLIENT ATTENDED A SEMINAR WORKSHOP ON GWG L BONDS THAT WAS PRESENTED BY THE SALES REP OF THE COMPANY. THE INVESTMENT WAS SOLD BY THE ADVISORY AFFILIATE THROUGH HIS BROKER/DEALER AND BASED ON HIS DUE DILIGENCE AND RESEARCH INCLUDING BUT NOT LIMITED TO

READING SALES MATERIALS, PROSPECTUS, MEETING WITH SALES REPS, AND ATTENDING DUE DILIGENT CONFERENCE MEETINGS AND HOW THE PRODUCT WAS REPRESENTED. UNFORTUNALLY THE GWG PRODUCT TOOK A TURN FOR THE WORST BEYOND THE CONTROL OF THE ADVISORY AFFILIATE BY GWG BOARD OF DIRECTORS SUSPENDING ITS INTEREST PAYMENTS, MATURITY PAYMENTS, AND REDEMPTION REQUESTS, AND THEN FILING CHAPTER 11 BANKRUPTCY 4 MONTHS LATER. IT IS BELIEVED THAT GWG IS USING CHAPTER 11 BANKRUPTCY FILING AS LEVERAGE TO REORGANIZE THE COMPANY. ADVISORY AFFILIATE DIDN'T HAVE A CRYSTAL BALL AT THE TIME HE SOLD THE INVESTMENT THAT THE COMPANY WOULD DO WHAT THEY DID AND BE IN THIS SITUATION. CLIENT HAS ACCOUNTS WITH THE RIA FIRM AND TRANSFERRED OUT IN JANUARY 2020. ADVISORY AFFILIATE NOTIFIED CLIENT AND GWG THAT HE WAS RESIGNING AS REPRESENTATIVE OF RECORD AND TO NOTIFY HIS NEW REGISTERED REPRESENTATIVE. CLIENT ALSO OWES FINAL ADVISORY FEES TO THIS RIA FIRM WHICH HE REFUSED TO PAY. CLIENT SIGNED VARIOUS DOCUMENTS AND DISCLOSURE BY GWG AND ADVISORY AFFILIATES BROKER/DEALER UNDERSTANDING THE RISKS INVOLVED. THE GWG INVESTMENT WAS DONE THROUGH THE ADVISORY AFFILIATE BROKER/DEALER AND NOT THROUGH THE RIA FIRM. NEITHER ADVISORY AFFILIATE NOR ADVISORY FIRM WAS NAMED AS A RESPONDENT IN THE ARBITRATION LAWSUIT. ONLY THE ADVISORY AFFILIATE BROKER/DEALER WAS LISTED AS A RESPONDENT. THERE WAS NO ALLEGATIONS IN THE ARBITRATION COMPLAINT REGARDING THE CLIENTS RIA ACCOUNT AND/OR THE RIA FIRM. --- -- THE AFFILIATE BROKER / DEALER SETTLED THIS MATTER. OUR RIA FIRM, NOR DID THE ADVISORY AFFILIATE PARTICATE IN ANY PART OF THE SETTLEMENT. CLIENT THE WITHDREW HIS ARBITRATION COMPLAINT.

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☑ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☑ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	1031460	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	GOLDSTEIN, PHILIP, ALAN (For individuals, Last, First, Middle)	

CRD Number:	2147679	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	Goldstein, Heath, Gary (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)

SEE BELOW IN COMMENTS FOR LIST OF PLAINTIFFS

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:
1.) AMOUNT TO BE DETERMINED AT ARBITRATION BUT NO LESS THAN $288,280 IN COMPENSATORY DAMAGES; 2.) LOST INCOME UNDER THE "WELL MANAGED PORTFOLIO" THEORY OF RECOVERY OR BENEFIT-OF-THE BARGAIN THEORY; 3.)DISGORGEMENT OF SALES COMMISSIONS; 4.)PUNITIVE OR EXEMPLARY DAMAGED; 5.)ATTORNEY'S FEES AND COSTS AND DISBURSEMENT INCURRED INCLUDING BUT NOT LIMITED TO FILING FEES; 6.)PRE & POST ARBITRATION AWARD INTERESTS; 7.)ANY OTHER RELIEF AS ARBITRATION PANEL DEEMS JUST AND PROPER

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
11/09/2022 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Direct Investment(s) - DPP & LP Interest(s)
Other Product Types:
NON-TRADED CORPORATE BOND

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA 22-2544 WESTERN INTERNATIONAL SECURITIES AND HEATH GOLDSTEIN ARE BOTH RESPONDENT / DEFENDANT

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
WESTERN INTERNATIONAL SECURITIES, INC; 1ST FINANCIAL INVESTMENT, INC; 1ST FINANCIAL INVESTMENTS, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
1.) VIOLATIONS OF SECTIONS 10(B) AND 20(A) OF THE 1934 ACT [15 U.S.C 78J(B) AND 78T(A)] AND RULE 10B-5 THEREUNDER [17 C.F.R. 240.10B-5]; 2.)VIOLATIONS OF THE PENNSYLVANIA UNFAIR TRADE PRACTICE AND CONSUMER PROTECTION LAW [73 P.S. 1-201 ET SEQ]; 3.)VIOLATION OF THE PENNSYLVANIA SECURITIES ACT OF 1972 [70 P.S. 1-101 ET SEQ]; 4.)BREACH OF FIDICIARY DUTY; 5.)COMMON LAW FRAUD; 6.)NEGLIGENCE, INCLUDING NEGLIGENT FAILURE TO SUPERVISE; 7.)BREACH OF CONTRACT

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
11/15/2022 ● Exact ○ Explanation
If not exact, provide explanation:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
08/24/2023 ● Exact ○ Explanation
If not exact, provide explanation:

13. Resolution Detail:
   A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 81,916.35
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

   B. Other Sanctions:
   C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
   SETTLEMENT SOLEY PAID BY WESTERN INTERNATIONAL SECURITIES. NO PERSONAL FUNDS CONTRIBUTED TOWARDS SETTLEMENT. AFFILIATES DIDN'T PARTICIPATE AND/OR PROVIDE ANY INPUT TOWARDS THE SETTLEMENT.

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
CLIENTS IN THE ARBITRATION CLAIM ARE R. NOONE; M ROHLAND; C GODOWSKI; J SWEENEY; T MANGAN; M TOMASSONI; A BRACK; J PEFFER; K & P KOCHIS, ALL LISTED AS PLAINTIFF IN THIS LAWSUIT. THIS LAWSUIT IS OF NO MERIT. IT'S BELIEVED MOST IF NOT ALL OF THE ABOVE PLAINTIFF'S

ATTENDED A PAST SEMINAR WORKSHOP ON THE GWG INVESTMENT THAT WAS PRESENTED BY THE SALES REP OF GWG. THE PRODUCT WAS SOLD BY ADVISORY AFFILIATE HEATH GOLDSTEIN TO THESE CLIENTS BASED ON HIS DUE DILIGENT OF THE COMPANY AND HOW THEY REPRESENTED THE PRODUCT. UNFORTUNELLY, GWG TOOK A TURN FOR THE WORST BEYOND THE CONTROL OF THE ADVISORY AFFILIATE, BY GWG SUSPENDING ALL INTEREST, MATURITY, AND REDEMPTION PAYMENTS AND THE FILING OF CHAPTER 11 BANKRUPTCY. AT THE TIME THE INVESTMENT WAS SOLD, THE ADVISORY AFFILIATE DIDN'T HAVE A CRYSTAL BALL THAT THE COMPANY WOULD DO WHAT THEY DID, OTHERWISE THIS INVESTMENT CERTAINLY WOULD NOT HAVE SOLD TO THE ABOVE CLIENTS. INSTEAD OF WAITING TO SEE WHAT THE OUTCOME OF THE GWG CASE, PLAINTIFF'S DECIDED TO FILE THIS LAWSUIT IN ATTEMPT TO RECOVER LOSSES AND DAMAGES. ADVISORY PHIL GOLDSTEIN DIDN'T SELL THE INVESTMENT, AND IS NOT A NAMED RESPONDENT OR DEFENDANT, BUT WAS LISTED IN THE MERITS OF THE LAWSUIT COMPLAINT. PHIL WAS PRESENT AT THE SEMINAR WORKSHOP AND AT SOME OF THE MEETING WITH THE CLIENTS WHEN THE PRODUCT WAS PRESENTED BY ADVISORY AFFILIATE HEATH GOLDSTEIN AS PHIL WAS DISCUSSING OTHER ADVISORY AND/OR ANNUITY OPTIONS WITH THEM. THE RIA FIRM WAS NOT LISTED AS A DEFENDANT OR IN THE MERITS OF THE COMPLAINT. THE NAMED RESPONDENTS OF THIS LAWSUIT IS HEATH GOLDSTEIN AND WESTERN INTERNATIONAL SECURITIES, THE B/D FOR WHICH HEATH IS AFFILIATED WITH. IN ORDER TO AVOID ADDITIONAL OUT OF POCKET EXPENSES, COST, AND FEES, THE B/D SETTLED WITH ALL THE CLIENTS. ALL CLIENTS SIGNED A RELEASE AND DISMISSED THEIR LAWSUIT WITH PREJUDICE. NEITHER ANY OF THE ADVISORY AFFILIATED, NOR THE ADVISORY FIRM WAS INVOLVED IN THE SETTLEMENT OR HAD TO CONTRIBUTE ANY FUNDS.

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL **OR** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☐ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☐ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	1031460	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	GOLDSTEIN, PHILIP, ALAN (For individuals, Last, First, Middle)	

CRD Number:	2147679	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	Goldstein, Heath, Gary (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)

MARYLOU CHIBIRKA

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:
1.) PRE-JUDGMENT INTEREST; 2.) INTEREST FROM DATE OF AWARD TILL FULLY PAID; 3.) FEES, COMMISSIONS, AND COMPENSATION EARNED FROM INVESTMENT; 4.) REASONABLE ATTORNEY FEES, EXPENSES, COSTS, INCLUDING FEES FOR EXPERT WITNESSES; 5.) IN THE ALTERNATIVE RESCISSION OR A RESCISSIONARY MEASURE OF DAMAGES HEREIN MAKE AN OFFER OF TENDER OF HER GWG L BOND INVESTMENT; 6.) AWARDING CLAIMANT, IN THE ALTERNATIVE, WELL-MANAGED PORTFOLIO THEORY OF DAMAGES; AND 7.) AWARDING SUCH ADDITIONAL EQUITABLE/INJUNCTIVE OR OTHER RELIEF AS DEEMED APPROPRIATE BY THE ARBITRATION PANEL

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
11/30/2022 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Debt - Corporate
Other Product Types:
DIRECT PARTICIPATION PROGRAM / ALTERNATIVE INVESTMENT

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA DISPUTE RESOLUTION 22-2733

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
1ST FINANCIAL INVESTMENTS, INC.; 1ST FINANCIAL INVESTMENT, INC. VERE GLOBAL ASSET MANAGEMENT (PHIL G) WESTERN INTERNATIONAL SECURITIES (HEATH G)

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
1.) BREACH OF FIDUCIARY OBLIGATIONS / DUTIES; 2.) BREACH OF CONTRACT; 3.) NEGLIGENCE / PROFESSIONAL NEGLIGENCE; 4.) FAILURE TO SUPERVISE; 5.) VIOLATIONS OF STATE & FEDERAL RULES AND REGULATIONS; 6.) AGENCY, RESPONDENT SUPERIOR AND CONTROL PERSON LIABILITY; 7.) GENERAL EQUITABLE PRINCIPALS THAT APPLY IN ARBITRATION

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
12/06/2022 ● Exact ○ Explanation
If not exact, provide explanation:
DATE IS WHEN SERVED TO RESPONDENT. ADVISORY FIRM OR AFFILIATES ARE NOT RESPONDENTS TO THE LAWSUIT

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
04/03/2023 ● Exact ○ Explanation
If not exact, provide explanation:

13. Resolution Detail:
A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 12,000.00
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

B. Other Sanctions:
FORMER CLIENT / PLAINTIFF TO DISMISS HER ARBITRATION COMPLAINT WITH PREJUDICE UPON EXECUTION OF SETTLEMENT AGREEMENT.

C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
NO PORTION LEVIED AGAINST ADVISORY AFFILIATE PERSONALLY.

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)

THIS ARBITRATION LAWSUIT STEMS FROM THE CHAPTER 11 BANKRUPTCY OF GWG L BONDS WHICH WERE SOLD BY ONE OF THE ADVISORY AFFILIATES THROUGH HIS BROKER/DEALER. THE OTHER ADVISORY AFFILIATE WAS NOT AFFILIATED WITH THE BROKER/DEALER BUT WAS NAMED IN THE MERITS OF THE COMPLAINT. NEITHER THE ADVISORY FIRM, NOR THE AFFILIATES ARE A NAMED RESPONDENT. CLIENT DECIDED TO FILE THIS ARBITRATION LAWSUIT INSTEAD OF WAITING FOR GWG TO GO THROUGH THE BANKRUPTCY PROCEDURES. GWG HAS ON APPROX 12/1/22 FILED ITS PLAN TO EMERGE FROM CHAPTER 11 BANKRUPTCY. IT IS THE UNDERSTANDING THAT NEED THIS TO BE APPROVED BY THE COURT AND THEN ALL THE CREDITORS. THE ADVISORY AFFILIATE'S BROKER / DEALER AND THEIR E&O CARRIER OFFERED A SETTLEMENT OFFER IN THIS MATTER, TO WHICH THE CLIENT ACCEPTED. UPON THE CLIENT EXECUTION OF SETTLEMENT AGREEMENT, CLIENT IS TO WITHDRAWAL HER ARBITRATION LAWSUIT WITH PREJUDICE. ADVISORY AFFILIATE DIDN'T PARTICIPATE IN ANY PART OF THE SETTLEMENT, NOR DID HAVE TO CONTRIBUTE ANY PERSONAL FIND.

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL *OR* ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☑ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☐ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number: 2147679

This *advisory affiliate* or *management person* is ○ a Firm ● an Individual

Registered: ● Yes ○ No

Name: Goldstein, Heath, Gary
(For individuals, Last, First, Middle)

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
CYNTHIA BROWN

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:
COMPENSATORY DAMAGES OR IN THE ALTERNATIVE ORDER OF RECISSION; PRE & POST JUDGEMENT INTEREST; WELL MANAGED ACCOUNT THEORY DAMAGES; RECOVERY OF ALL COSTS INCLUDING BUT NOT LIMITED TO ATTORNEY FEES, EXPERT FEES; AND FORUM FEES; PUNITIVE DAMAGES

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
02/27/2023 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Debt - Corporate
Other Product Types:
ALTERNATIVE INVESTMENTS

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA 23-492

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
WESTERN INTERNATIONAL SECURITIES INC; 1ST FINANCIAL INVESTMENT, INC.; 1ST FINANCIAL INVESTMENTS, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
UNSUITABLE INVESTMENT AND MISLEADING INVESTMENT RECOMMENDATION; MISREPRESENTED AND OMITTED MATERIAL FACTS & RISKS; FAILURE TO CONDUCT REASONABLE DUE DILIGENCE; OTHER CAUSE OF ACTION; NEGLIGENCE; BREACH OF FIDUCIARY DUTY; FAILURE TO SUPERVISE.

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
03/07/2023 ● Exact ○ Explanation
If not exact, provide explanation:
ABOVE DATE IS BOTH DATE RECEIVED BY BROKERAGE FIRM, ADVISOR FIRM, AND ADVISOR

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
04/11/2024 ● Exact ○ Explanation
If not exact, provide explanation:
ABOVE DATE IS WHEN THE SETTLEMENT AGREEMENT WAS SIGNED BY ADVISOR AFFILIATE FORMER BROKER / DEALER, AND FORMER CLIENT

13. Resolution Detail:

A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 210,000.00
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

B. Other Sanctions:

C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
ADVISORY AFFILIATE DID NOT, NOR WAS REQUIRED TO CONTRIBUTE TO ANY PART OF THE SETTLEMENT AMOUNT. SETTLEMENT AMOUNT WAS PAID BY THE ADVISOR AFFILIATE BROKER / DEALER TO THE ADVISOR'S FORMER CLIENT

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
THE LAWSUIT IS A RESULT OF THE COMPLAINANT'S INVESTMENT IN GWG L BONDS THAT WERE SOLD THROUGH THE ADVISOR AFFILIATES BROKERAGE FIRM. COMPLAINANT RETAINED AN ATTORNEY AND SOUGHT DEMAND FROM ADVISOR'S AFFILIATES BROKERAGE FIRM. BROKERAGE FIRM DENIED CLAIM. CLIENT NOW SOUGHT RELIEF VIA FINRA ARBITRATION. COMPLAINANT WAS ORIGINALLY HAPPY WITH THE INVESTMENT, HOWEVER UNFORTUNALLY IN JANUARY, 2022 GWG ABRUPTLY SUSPENDED ALL INTEREST PAYMENTS, REDEMPTION REQUESTS AND MATURITY PAYMENTS, AND IN APRIL, 2022, GWG FILED FOR CHAPTER 11 BANKRUPTCY PROTECTION. INSTEAD OF LETTING THE BANKRUPTCY PROCEDURE RUN THROUGH ITS COURSE, COMPLAINANT SEEKS DAMAGES PREMATURLY BEFORE GWG REORG THROUGH THE BANKRUPTCY COURT. IT IS THE ADVISORY AFFILIATE'S UNDERSTANDING THAT GWG DID FILE ON DECEMBER, 2022 THEIR CHAPTER 11 REORG PLAN TO EMERGE FROM BANKRUPTCY. ADVISORY AFFILIATE, ADVISORY'S FIRM, AND DBA ARE NOT LISTED AS A RESPONDENT, ONLY ADVISOR AFFILIATE'S BROKERAGE FIRM, WESTERN INTERNATIONAL SECURITIES IS LIATED AS RESPONDENT & DEFENDANT. ADVISORY AFFILIATE SOLD THIS INVESTMENT TO COMPLAINANT AS A BROKERAGE PRODUCT THROUGH THE BROKERAGE FIRM. -- THE ADVISOR AFFILIATE BROKER / DEALER SETTLED THIS MATTER WITH THE ADVISOR'S FORMER CLIENT TO AVOID ANY ADDITIONAL ARBITRATION COSTS, ATTORNEYS' FEES AND POTENTIAL TRAVEL COSTS. ADVISOR'S FORMER CLIENT SIGNED A SETTLEMENT RELEASE AND DISMISSED & WITHDREW THE ARBITRATION COMPLAINT WITH PREJUDICE. ADVISOR AFFILIATE DID NOT CONTRIBUTE NOR WAS INVOLVED IN ANY PART OF THE SETTLEMENT NEGOTIATIONS AND WAS ONLY BETWEEN ADVISOR'S FORMER BROKER / DEALER, THE FORMER CLIENT AND THEIR RESPECTIVE ATTORNEYS. ADVISOR AFFILIATE DID NOT, NOR WAS REQUIRED TO CONTRIBUTE ANY PARSONAL FUNDS TOWARDS THIS SETTLEMENT.

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Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☐ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☐ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	2147679	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	Goldstein, Heath, Gary (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
DENISE MARCELL

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:
1.) COMPENSATORY DAMAGES 2.) INTEREST AT THE LEGAL RATE FROM DATE OF PURCHASE 3.) PUNITIVE DAMAGES 4.) COST OF PROCEEDING 5.) SUCH OTHER RELIEF AS IS JUST AND PROPER

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
04/10/2023 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Debt - Corporate
Other Product Types:
ALTERNATIVE INVESTMENTS

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA 23-898

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
WESTERN INTERNATIONAL SECURITIES; 1ST FINANCIAL INVESTMENTS, INC; 1ST FINANCIAL INVESTMENT, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
1.) BREACH OF FIDUCIARY DUTY; 2.) NEGLIGENCE AND NEGLIGENT MISREPRESENTATION; 3.) BREACH OF CONTRACT; 4.) FAILURE TO SUPERVISE; AND 5.) NEGLIGENT - VIOLATION OF REGULATION BEST INTEREST

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
04/17/2023 ● Exact ○ Explanation
If not exact, provide explanation:
DATE RECEIVED BY ADVISOR AFFILIATE'S BROKER / DEALER

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
11/30/2023 ● Exact ○ Explanation
If not exact, provide explanation:
DATE SETTLED BY ADVISORY AFFILIATE'S BROKER / DEALER

13. Resolution Detail:

A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 12,000.00
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

B. Other Sanctions:

C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
SETTLED 100% BY ADVISORY AFFILIATE'S BROKER / DEALER.

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
THIS ARBITRATION LAWSUIT STEMS FROM THE ADVISORY AFFILIATE'S FORMER CLIENT'S INVESTMENTS IN GWG L BONDS THROUGH THE ADVISORY AFFILIATES BROKER/DEALER. IN APRIL 20, 2022, GWG FILED CHAPTER 11 BANKRUPTCY, AND CLIENT IS SEEKING REIMBURSEMENT OF HER INVESTMENT. CLIENT CAME TO A SEMINAR BY 2 INSURANCE AGENTS IN ADVISORY AFFILIATES OFFICE AND CLIENT WAS REFERRED. CLIENT SIGNED AND ACKNOWLEDGED VARIOUS DOCUMENTATION FROM BOTH THE ADVISORY AFFILIATE'S BROKER / DEALER AND GWG THAT THE INVESTMENTS ARE NON-TRADED AND A DEGREE OF HIGH RISK. CLIENT WAS ALSO GIVEN SALES MATERIAL AND PROSPECTUS TO READ AND REVIEW BEFORE INVESTING. ONLY ADVISORY AFFILIATE BROKER/DEALER WAS THE ONLY NAMED RESPONDENT. NO ONE ELSE LISTED AS A NAMED RESPONDENT INCLUDING ADVISORY FIRM, ADVISORY AFFILIATE, AND FIRM & AFFILIATE DBA. --- ADVISORY AFFILIATE'S BROKER / DEALER, WESTERN INTERNATIONAL SECURITIES SETTLED THIS MATTER WITH THE PLAITIFF TO AVOID FURTHER LITIGATION AND COSTS. ADVISORY AFFILIATE WAS NOT INVOLVED IN ANY PART OF THE SETTLEMENT, NOR HAD TO CONTRIBUTE ANY PERSONAL FUNDS TOWARDS THE SETTLEMENT. IN ACCEPTING THE SETTLEMENT OFFERED BY THE ADVISORY AFFILIATE'S BROKER / DEALER, THE CLIENT EXECUTED A RELEASE AGREEMENT AND IN EXCHANGE TO WITHDRAWAL THE LAWSUIT COMPLAINT WITH PREJUDICE.

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☐ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☐ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	2147679	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	Goldstein, Heath, Gary (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
RENEE SLEBODA

2. Principal Relief Sought: (Check appropriate item)
Civil Penalty(ies)/Fine(s)
Other Relief Sought:
1.) PRE & POST JUDGMENT INTEREST; 2.) WELL-MANAGED ACCOUNT THEORY DAMAGES; 3.) RECOVERY OF ALL COSTS, ATTORNEY FEES, EXPERT FEES, AND FORUM FEES; AND 4.) PUNITIVE DAMAGES TO PUNISH AND DETER ANY FUTURE MISCONDUCT.

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
05/12/2023 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Debt - Corporate
Other Product Types:
DPP / ALTERNATIVE INVESTMENT

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA 23-1350

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
WESTERN INTERNATIONAL SECURITIES, INC.; 1ST FINANCIAL INVESTMENT, INC; 1ST FINANCIAL INVESTMENTS, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
1.) UNSUITABLE & MISLEADING INVESTMENT RECOMMENDATION; 2.) MISREPRESENTED & OMITTED MATERIAL FACTS; 3.) FAILURE TO CONDUCT REASONABLE DUE DILIGENCE; 4.) DAMAGES; 5.) NEGLIGENCE; 6.) MISREPRESENTATION AND OMISSION OF MATERIAL FACTS; AND 7.) FAILURE TO SUPERVISE

8. Current Status? ● Pending ○ On Appeal ○ Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
05/19/2023 ● Exact ○ Explanation
If not exact, provide explanation:
DATE SERVED TO ADVISOR AFFILIATE BROKER / DEALER

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):

11/17/2023 ● Exact ○ Explanation
If not exact, provide explanation:
DATE ABOVE IS WHEN SETTLED BY ADVISORY AFFILIATE'S BROKER / DEALER

13. Resolution Detail:

A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 13,500.00
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

B. Other Sanctions:

C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
ADVISORY AFFILIATE DID NOT HAVE TO CONTRIBUTE ANY PERSONAL FUNDS TOWARDS THIS MATTER

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
THE ARBITRATION LAWSUIT IS FROM THE CHAPTER 11 BANKRUPTCY OF GWG. CLIENT ATTENDED A WORKSHOP ON RETIREMENT PLANNING BY 2 INSURANCE AGENTS IN OUR OFFICE. CLIENT MET WITH THOSE AGENTS. CLIENT ALSO DID AN INDEX ANNUITY, AND AN ADVISORY ACCOUNT. NOTHING WAS MENTIONED IN THE COMPLAINT ON THESE. WAS THEN REFERRED TO ADVISORY AFFILIATE ON THE GWG L BONDS. WAS INTERESTED DUE TO THE RATE OF RETURN ON THE INVESTMENT. IT WAS RECOMMENDED AND SOLD BASED ADVISORY AFFILIATES DUE DILIGENT OF THE GWG AND HOW THEY REPRESENTED THE COMPANY. A SEMINAR WORKSHOP WAS HOSTED BY GWG AND PRESENTED BY THE SALESMAN OF GWG, WHICH THE CLIENT RECEIVED AN INVITE. CLIENT ATTENDED WITH HER MOTHER. ANY QUESTIONS WAS ASKED TO THE SALESMAN, WAS BELIEVED TO THE CLIENTS SATISFACTORY. UNFORTUNELLY, GWG TOOK A TURN FOR THE WORST BY THE BOARD TAKING ACTION TO SUSPEND ALL INTEREST, MATURITY PAYMENTS, AND REDEMPTION PAYMENTS AND THE FILING OF CHAPTER 11 BANKRUPTCY PROTECTION. IT'S BELIEVED THAT THE COMPANY WAS USING THE LEVERAGE OF THE BANKRUPTCY TO REORGANIZE THE COMPANY VERSUS GETTING FORECLOSED ON. GWG HAS SINCE EMERGED FROM BANKRUPTCY. CLIENT STILL FILED THIS ARBITRATION LAWSUIT. INVESTMENT WAS NOT SOLD THROUGH ADVISORY FIRM, BUT THROUGH ADVISORY AFFILIATE BROKER / DEALER AS A BROKERAGE TRANSACTION. THE BROKER / DEALER IS THE ONLY NAMED RESPONDENT. THE ADVIS AFFILIATE, ADVISORY FIRM AND OUR DBA NAME WE USE TO THE PUBLIC IS NOT NAMED AS A RESPONDENT. --- ADVISORY AFFILIATE'S FORMER BROKER / DEALER DECIDED TO SETTLE THIS MATTER TO AVOID ADDITIONAL LITIGATION AND ATTORNEY COSTS WHICH THE CLIENT ACCEPTED THE OFFER. CLIENT SIGNED RELEASE AND WITHDREW HER LAWSUIT WITH PREJUDICE. ADVISORY AFFILIATE WAS NOT INVOLVED IN ANY PART OF THE SETTLMENT NOR HAD TO CONTRIBUTE ANY PERSONAL FUNDS. NEITHER THE ADVISORY AFFILIATE OR THIS FIRM WAS A NAMED RESPONDENT / DEFENDANT. ONLY THE ADVISORY AFFILIATE'S BROKER / DEALER WAS THE NAMED.

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☑ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☑ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	2147679	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	Goldstein, Heath, Gary (For individuals, Last, First, Middle)	

CRD Number:	1031460	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	GOLDSTEIN, PHILIP, ALAN (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
ELLIE MCNAMARA AND ESTATE OF JOSEPH MCNAMARA

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:
A. RESCISSION; B. GENERAL AND COMPENSATORY DAMAGES OF BETWEEN $100,000.01 AND $500,000; C. UNDER-PERFORMANCE DAMAGES; D. ATTORNEYS' FEES; E. COSTS; F. PUNITIVE DAMAGES; G. INTERESTS; AND H. SUCH OTHER AND FURTHER RELIEF AS THE PANEL DEEMS JUST.

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
12/20/2023 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Debt - Corporate
Other Product Types:
EQUITY INDEX ANNUITY

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA ARBITRATION 23-3588

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
1ST FINANCIAL INVESTMENTS, INC; 1ST FINANCIAL SAFEGUARD, CO. WESTERN INTERNATIONAL SECURITIES, INC (HEATH ONLY)

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
1) RESCISSION, BENEFIT OF THE BARGAIN DAMAGES AND/OR COMPENSATORY DAMAGES; 2) BREACH OF WRITTEN CONTRACT PURSUANT TO THE CUSTOMER AGREEMENTS; 3) BREACH OF FIDUCIARY DUTY OF FAILING TO ACT IN CLAIMANT'S BEST INTERESTS, TO DEAL FAIRLY AND HONESTLY WITH THE CLAIMANT, TO OBSERVE FAIR BUSINESS PRACTICES AND EQUITABLE PRINCIPLES OF TRADE AS EMBODIED IN THE STANDARDS OF THE SECURITIES INDUSTRY, FINRA RULES, AND RESPONDENTS' OWN INTERNAL POLICIES, TO MAKE ONLY SUITABLE INVESTMENTS AND NOT TO KNOWINGLY OR NEGLIGENTLY MAKE MATERIAL MISREPRESENTATIONS AND OMISSIONS TO CLAIMANT; 4) FAILURE TO SUPERVISE BY NEGLECTING ITS DUTY TO PROPERLY SUPERVISE AND CONTROL ITS AGENTS PURSUANT, BUT NOT LIMITED, TO SECTION 20(A) OF THE 1934 SECURITIES AND EXCHANGE ACT, FINRA RULE 3111, AND SECTION 342 OF THE NYSE RULES; 5) NEGLIGENCE AND GROSS NEGLIGENCE; 6) MISREPRESENTATIONS AND OMISSIONS; 7) VIOLATION OF FINRA RULES; 8) VIOLATIONS OF THE PENNSYLVANIA SECURITIES ACT; 9) VIOLATION OF THE FEDERAL SECURITIES LAWS; AND 10) VIOLATION OF THE BEST INTEREST OBLIGATIONS (REG B1)

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
12/27/2023 ● Exact ○ Explanation

If not exact, provide explanation:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
11/08/2024 ● Exact ○ Explanation
If not exact, provide explanation:

13. Resolution Detail:
A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 18,000.00
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

B. Other Sanctions:

C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
ADVISORY AFFILIATE DID NOT PARTICIPATE IN ANY PART OF THE SETTLEMENT WITH PLAINTIFF, NOR DID ADVISORY AFFILIATE HAVE TO CONTRIBUTE ANY PERSONAL FUNDS. SETTLEMENT WAS PAID TO PLAINTIFF BY ADVISORY AFFILIATE'S BROKER / DEALER

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
THIS LAWSUIT IS THE RESULT OF THE FORMER CLIENTS INVESTMENT IN GWG L BONDS AND F&G LIFE EQUITY INDEX ANNUITY. CLIENTS ATTENDED A SEMINAR WORKSHOP BY OUR OFFICE ON EQUITY INDEX ANNUITIES. CLIENTS MET WITH REP IN OUR OFFICE. CLIENTS WERE REFERRED TO ONE OF THE AFFILIATES WHO WAS A REGISTERED REP ON THE GWG PRODUCT. CLIENTS WERE PROVIDED ILLUSTRATION ON ANNUITY AND SALES MATERIAL ON BOTH ANNUITY AND GWG. CLIENT'S SIGNED ANNUITY APPLICATION AND SUBSCRIPTION DOCUMENTS ON GWG AS WELL AS ANY AND ALL SUPPLEMENTAL DISCLOSURE DOCUMENTS THAT THEY UNDERSTANDED THE RESPECTIVE PROGRAMS. WITH REGARD TO THE ANNUITY CLIENT WAS PROVIDED A FREE LOOK PERIOD PURSUANT TO PA INSURANCE LAWS. THE TIME TO ASK QUESTIONS OR IF THERE WAS ISSUES AND WANTED TO REJECT THE POLICY WAS DURING THE FREE LOOK PERIOD AND NOT NOW. HEATH GOLDSTEIN AND HIS BROKER / DEALER ARE A NAMED RESPONDENT AND DEFENDANT. NEITHER PHILIP GOLDSTEIN OR ANY OF THE 1ST FINANCIAL COMPANY FIRMS WERE NAMED AS A RESPONDENT OR DEFENDANT -- THE ADVISORY AFFILIATE'S BROKER / DEALER SETTLED THE MATTER WITH THE PLAINTIFF TO AVOID ANY ADDITIONAL COSTS. THE ADVISORY AFFILIATE DID NOT PARTICIPATE IN ANY PART OF THE SETTLEMENT NOR HAD TO CONTRIBUTE ANY PERSONAL FUNDS. PLAINTIFF SIGNED RELEASE AND WITHDREW HER LAWSUIT COMPLAINT WITH PREJUDICE

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☐ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☐ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	2147679	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	Goldstein, Heath, Gary (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
LOUIS DEFAZIO, SR.

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:
DISGORGEMENT; PUNITIVE DAMAGES; ATTORNEY FEES; EXPERT FEES; FILING FEES; FORUM FEES; WELL BALANCE THEORY & WELL MANAGED ACCOUNT DAMAGES PRE & POST JUDGEMENT ANY OTHER RELIEF THE PANEL DEEMS JUST

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
04/30/2024 ○ Exact ● Explanation
If not exact, provide explanation:
UNKNOWN ON EXACT FILING DATE

4. Principal Product Type:
Direct Investment(s) - DPP & LP Interest(s)
Other Product Types:
CORPORATE BOND; REAL-ESTATE INVESTMENT TRUST

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
WESTERN INTENATIONAL SECURITIES; 1ST FINANCIAL INVESTMENT, INC; 1ST FINANCIAL INVESTMENTS, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
1.) UNSUITABLE AND MISLEADING INVESTMENT RECOMMENDATIONS; 2.) MISREPRESENTED AND OMITTED MATERIALS FACTS AND RISKS; 3.) FAILURE TO CONDUCT REASONABLE DUE DILIGENCE; 4.) NEGLIGENCE; 5.) MISREPRESENTATION AND OMISSIONS OF MATERIAL FACTS; AND 6.) BREACH OF FIDUCIARY DUTY

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
05/09/2024 ● Exact ○ Explanation
If not exact, provide explanation:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
02/20/2025 ○ Exact ● Explanation
If not exact, provide explanation:
DATE ABOVE IS WHEN MATTER WAS SETTLED BY IAR'S FORMER BROKER / DEALER

13. Resolution Detail:

A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 24,750.00
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

B. Other Sanctions:

C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
SETTLEMENT WAS PAID FOR BY IAR'S FORMER BROKER / DEALER. NO PART OF THE SETTLEMENT WAS PAID BY RIA, OR IAR

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
ABOVE FORMER CLIENT OF IAR INITIALLY WROTE A WRITTEN COMPLAINT TO THE IAR'S BROKER / DEALER TO WHICH WAS ANSWERED AND DENIED THE CLIENTS CLAIMS. CLIENT NOW FILES AN ARBITRATION LAWSUIT AGAINST THE IAR'S BROKER / DEALER ONLY. ADVISORY AFFILIATE OR THIS FIRM IS NOT A NAMED DEFENDANT OR RESPONDENT. ONLY IAR'S BROKER / DEALER IS LISTED AS DEFENDANT. THE IAR, AND THIS FIRM ARE NOT NAMED IN THE COMPLAINT. THE FORMER CLIENT WAS A CLIENT OF THE THIS FIRM, THERE WAS NOTHING IN THE ARBITRATION LAWSUIT REGARDING OR COMPLAINING ABOUT HIS ADVISORY ACCOUNT CLIENT SEEKS DAMAGES OF HIS LOSSES FROM GWG BONDS AND SILA REALTY. UNFORTUNALLY GWG FILED AND EMERGED FROM CHAPTER 11 BANKRUPTCY. SILA REALTY ORIGINALLY WAS CARTER VALIS REIT WHICH ORIGINALLY COMPRISED OF DATA CENTERS AND HEALTHCARE. THE DATA CENTER PORTIONS WERE SOLD OFF AND THE REIT THEN CHANGED THEIR NAME TO SILA. IT'S BELIEVED THAT THE CLIENT RECEIVED A DISTRIBUTION AS A RESULT OF THE SALE OF THE DATA CENTER, THUS THE REASON FOR THE PRICE DIFFERENCE IN THE REIT. CLIENT WAS PROVIDED SALES MATERIAL AND PROSPECTUS ON THESE PRODUCTS. CLIENT SIGNED DOCUMENTS AND AGREEMENTS ACKNOWLEDGING THE RISKS, WAS SUITABLE, AND READ THE PROSPECTUS. CLIENT DOESN'T WANT TO ACCEPT HIS OWN RESPONSIBILITY AND WANTS TO HOLD THE BROKER / DEALER RESPONSIBLE FOR THE LOSS IN A HEAD I WIN TAILS YOU LOSE THEORY. NO ONE HAS A CRYSTAL BALL AND CAN PREDICT THE OUTCOME OF THESE OR ANY INVESTMENTS. -- IAR'S FORMER BROKER / DEALER SETTLED THIS MATTER WITH THE FORMER CLIENT TO AVOID ANY ADDITIONAL COSTS AND LAWYER FEES, WHICH THE FORMER CLIENT ACCEPTED. NEITHER THE IAR OR THIS FIRM PARTICIPATED IN ANY PART OF THE SETTLEMENT, AND NOR DID EITHER IAR OR THIS FIRM HAD TO CONTRIBUTE ANY FUNDS TOWARDS THIS SETTLEMENT. THE FORMER CLIENT AND IAR'S BROKER / DEALER EXECUTED A SETTLEMENT AGREEMENT, AND THE FORMER CLIENT WITHDREW AND DISMISSED HIS LAWSUIT WITH PREJUDICE.

This Disclosure Reporting Page (DRP ADV) is an ○ INITIAL ***OR*** ● AMENDED response used to report details for affirmative responses to Item 2.E. of Part 1B of Form ADV.

Arbitration

Check Part 1B item(s) being responded to:

☑ 2.E(1) ☐ 2.E(2) ☐ 2.E(3) ☐ 2.E(4) ☑ 2.E(5)

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Item 2.E. Use only one DRP to report details related to the same event. Unrelated arbitration actions must be reported on separate DRPs.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	2147679	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	Goldstein, Heath, Gary (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Arbitration/Reparation Claim initiated by: (Name of private plaintiff, firm, etc.)
DEMETRIUS YACKANICH, III AND JANE HANLEY

2. Principal Relief Sought: (Check appropriate item)
Money Damages (Private/Civil Claim)
Other Relief Sought:
1.) UNDER PERFORMANCE DAMAGES 2.) ATTORNEY FEES 3.) COST OR PROCEEDING 4.) PUNITIVE DAMAGES 5.) INTEREST AT LEGAL RATE ON ALL SUMS RECOVERED 6.) OTHER RELIEF AS DEEM JUST AND APPROPIATE

3. Initiation Date of Arbitration/Reparation Claim (MM/DD/YYYY):
08/26/2024 ● Exact ○ Explanation
If not exact, provide explanation:

4. Principal Product Type:
Debt - Government
Other Product Types:
DIRECT INVESTMENT

5. Arbitration/Reparation Claim was filed with (*FINRA*, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
FINRA DISPUTE RESOLUTION 24-1839

6. *Advisory Affiliate's* or *Management Person's* Employing Firm when activity occurred which led to the arbitration/reparation (if applicable):
WESTERN INTERNATIONAL SECURITIES, INC; 1ST FINANCIAL INVESTMENT, INC.; AND 1ST FINANCIAL INVESTMENTS, INC.

7. Describe the allegations related to this arbitration/reparation (your response must fit within the space provided):
1.) INVESTMENT RECOMMENDATION WAS UNSUITABLE AND MISLEADING; 2.) BREACH OF WRITTEN CONTRACT; 3.) BREACH OF FIDUCIARY DUTY; 4.) FAILURE TO SUPERVISE; 5.) NEGLIGENCE AND GROSS NEGLIGENCE; 6.) MISREPRESENTATION AND OMISSIONS; 7.) VIOLATION OF FEDERAL SECURITIES LAWS 8.) VIOLATION OF FINRA RULES 9.) VIOLATION OF PENNSYLVANIA SECURITIES ACT OF 1972 10.) VIOLATION OF REGULATION BEST INTEREST OBLIGATIONS

8. Current Status? ○ Pending ○ On Appeal ● Final

9. If on appeal, action appealed to: (provide name of court) and Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM/DD/YYYY):
09/11/2024 ● Exact ○ Explanation
If not exact, provide explanation:
ABOVE DATE IS WHEN SERVED TO REPRESENTATIVE'S BROKER / DEALER. 9/20/2024 DATE RECEIVED BY REPRESENTATIVE FROM BROKER / DEALER

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11. How was matter resolved (select appropriate item):
Settled

12. Resolution Date (MM/DD/YYYY):
08/13/2025 ● Exact ○ Explanation
If not exact, provide explanation:

13. Resolution Detail:
    A. Were any of the following Sanctions *Ordered* or Relief Granted (check appropriate items)?

☐ Monetary Award	Amount: $
☑ Settlement	Amount: $ 37,500.00
☐ Disgorgement/Restitution	Amount: $
☐ Injunction	

    B. Other Sanctions:
    C. Sanction detail: If disposition resulted in a penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you, an *advisory affiliate* or *management person*, date paid and if any portion of penalty was waived:
    SETTLED BY ADVISORY AFFILIATE'S FORMER BROKER / DEALER

14. Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided.)
REPRESENTATIVE IS NOT LISTED AS A RESPONDENT / DEFENDANT, NOR LISTED IN ANY OF THE MERITS IN THIS LAWSUIT. REPRESENTATIVE IS NOT LISTED AS ANY PART OF BEING INVOLVED AND/OR SALES PRACTICE VIOLATIONS. EVERYTHING AND ANYTHING IN THIS LAWSUIT ALL PERTAIN TO HIS FORMER BROKER / DEALER, WESTERN INTERNATIONAL SECURITIES. REPRESENTATIVE WAS REGISTERED REPRESENTATIVE FOR THE ABOVE CLIENTS AND SOLD THEM THE PRODUCT IN QUESTION. HE BELIEVES THAT BOTH CLIENTS CAME TO A SEMINAR WORKSHOP THAT WAS SPONSORED AND HOSTED GWG THE PRODUCT SPONSOR. BOTH CLIENTS WERE GIVEN PROSPECTUS AND SALES MATERIALS PRIOR TO BOTH CLIENTS PURCHASING THE PRODUCT. BOTH CLIENTS ALSO SIGNED VARIOUS DOCUMENTS ACKNOWLEDGING THE RISKS THAT THE BONDS WERE NOT TRADED, THAT THEY WERE SUITABLE. THESE FORMER CLIENTS ALSO DOES NOT WANT TO ACCEPT THEY OWN RESPONSIBILITY THAT THEY ULTIMATELY MADE THE DECISION TO PURCHASE THE INVESTMENT AND IS USING THE TACTIC "HEAD I WIN, TAILS YOU LOSE" THEORY. ONLY THE REPRESENTATIVE'S BROKER / DEALER WAS NAMED AS RESPONDENT AND IN THE MERITS OF THE COMPLAINT. THIS FIRM AND OUR D/B/A WERE NOT NAMED AS A RESPONDENT, NOR LISTED IN ANY OF THE MERITS OF THE COMPLAINT. -- THE ADVISORY AFFILIATE'S FORMER BROKER / DEALER SETTLED THIS MATTER PRIOR TO ARBITRATION HEARING IN ORDER TO AVOID ANY ADDITIONAL LAWYER FEES, TRAVEL EXPENSES, AND OTHER COSTS TO WHICH BOTH THE FORMER CLIENTS ACCEPTED THE OFFICER. BOTH CLIENT'S SIGNED AND EXECUTED A RELEASE AND THE LAWSUIT WAS DISMISSED BY THE FORMER CLIENTS WITH PREJUDICE. ADVISORY AFFILIATE DID NOT PARTICIPATE AND/OR WAS NOT INVOLVED IN ANY PART OF THE NEGOTIATIONS AND/OR SETTLEMENT PROCESS, NOR WAS ADVISORY AFFILIATE, AND/OR THIS FIRM ASKED NOR OFFERED TO CONTRIBUTE ANY FUNDS TOWARDS THIS SETTLEMENT.

Bond DRPs

No Information Filed

Judgment/Lien DRPs

This Disclosure Reporting Page (DRP ADV) is an ○ *INITIAL* ***OR*** ● *AMENDED* response used to report details for affirmative responses to Item 2.D. of Part 1B of Form ADV.

Judgment/Lien

Check Part 1B item(s) being responded to:

☑ 2D

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:

This *advisory affiliate* or *management person* is ● a Firm ○ an Individual

Registered: ○ Yes ● No

Name: 1ST FINANCIAL INVESTMENTS, INC
(For individuals, Last, First, Middle)

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Judgment/Lien Amount:
   $ 944.00

2. Judgment/Lien Holder:
   NEW YORK

3. Judgment/Lien Type:
   Tax

4. Date Filed (MM/DD/YYYY):
   02/14/2018 ● Exact ○ Explanation
   If not exact, provide explanation:

5. Is Judgment/Lien outstanding? ● Yes ○ No
   If No, provide status date (MM/DD/YYYY):
   ○ Exact ○ Explanation
   If not exact, provide explanation:

   If No, how was matter resolved?

6. Court (Name of Federal, State or Foreign Court), Location of Court (City or County and State or Country) and Docket/Case Number:
   ALBANY COUNTY COURT, 3RD JUDICIAL DISTRICT OF THE STATE OF NEW YORK CITY & COUNTY OF ALBANY, STATE OF NEW YORK, UNITED STATES OF AMERICA X18-11013 WARRANT ID# E-036230344-W004-2

7. Provide a brief summary of events leading to the action and any payment schedule details including current status (if applicable) (your response must fit within the space provided):
   UNAWARE OF STATE FILED TAX WARRANT / LIEN. ADVISORY NEVER RECEIVED ANY NOTICE FROM STATE ON FILING. BOTH FIRM AND ADVISORY AFFILIATE LEARNED ABOUT FILING 6/20/2022

This Disclosure Reporting Page (DRP ADV) is an ○ *INITIAL* ***OR*** ● *AMENDED* response used to report details for affirmative responses to Item 2.D. of Part 1B of Form ADV.

Judgment/Lien

Check Part 1B item(s) being responded to:

☑ 2D

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

   ○ You (the advisory firm)

   ○ You and one or more of your *advisory affiliates* or *management persons*

   ● One or more of your *advisory affiliates* or *management persons*

   If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
   If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

   ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

   CRD Number:

   This *advisory affiliate* or *management person* is ● a Firm ○ an Individual

   Registered: ○ Yes ● No

   Name: 1ST FINANCIAL INVESTMENTS, INC
   (For individuals, Last, First, Middle)

   ☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

   ☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Judgment/Lien Amount:
$ 1,433.19

2. Judgment/Lien Holder:
NEW YORK

3. Judgment/Lien Type:
Tax

4. Date Filed (MM/DD/YYYY):
05/15/2015 ● Exact ○ Explanation
If not exact, provide explanation:

5. Is Judgment/Lien outstanding? ● Yes ○ No
If No, provide status date (MM/DD/YYYY):
○ Exact ○ Explanation
If not exact, provide explanation:

If No, how was matter resolved?

6. Court (Name of Federal, State or Foreign Court), Location of Court (City or County and State or Country) and Docket/Case Number:
ALBANY COUNTY COURT 3RD JUDICIAL DISTRICT OF THE STATE OF NEW YORK CITY & COUNTY OF ALBANY STATE OF NEW YORK, UNITED STATES OF AMERICA X15-10897 WARRENT ID# E-036230344-W003-7

7. Provide a brief summary of events leading to the action and any payment schedule details including current status (if applicable) (your response must fit within the space provided):
UNAWARE OF STATE FILED TAX WARRANT / LIEN. ADVISORY NEVER RECEIVED ANY NOTICE FROM STATE ON FILING. BOTH FIRM AND ADVISORY AFFILIATE LEARNED ABOUT FILING 6/20/2022

This Disclosure Reporting Page (DRP ADV) is an ○ *INITIAL* ***OR*** ● *AMENDED* response used to report details for affirmative responses to Item 2.D. of Part 1B of Form ADV.

Judgment/Lien

Check Part 1B item(s) being responded to:

☑ 2D

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:

This *advisory affiliate* or *management person* is ● a Firm ○ an Individual

Registered: ○ Yes ● No

Name: 1ST FINANCIAL INVESTMENTS, INC

(For individuals, Last, First, Middle)

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Judgment/Lien Amount:
$ 3,524.69

2. Judgment/Lien Holder:
NEW YORK

3. Judgment/Lien Type:
Tax

4. Date Filed (MM/DD/YYYY):
07/19/2014 ● Exact ○ Explanation
If not exact, provide explanation:

5. Is Judgment/Lien outstanding? ● Yes ○ No
If No, provide status date (MM/DD/YYYY):
○ Exact ○ Explanation
If not exact, provide explanation:

If No, how was matter resolved?

6. Court (Name of Federal, State or Foreign Court), Location of Court (City or County and State or Country) and Docket/Case Number:
ALBANY COUNTY COURT 3RD JUDICIAL DISTRICT OF THE STATE OF NEW YORK CITY & COUNTY OF ALBANY, STATE OF NEW YORK, UNITED STATES OF AMERICA X14-19196 WARRENT ID# E-036230344-W002-3

7. Provide a brief summary of events leading to the action and any payment schedule details including current status (if applicable) (your response must fit within the space provided):
UNAWARE OF STATE FILED TAX WARRANT / LIEN. ADVISORY NEVER RECEIVED ANY NOTICE FROM STATE ON FILING. BOTH FIRM AND ADVISORY AFFILIATE LEARNED ABOUT FILING 6/20/2022

This Disclosure Reporting Page (DRP ADV) is an ○ *INITIAL* ***OR*** ● *AMENDED* response used to report details for affirmative responses to Item 2.D. of Part 1B of Form ADV.

Judgment/Lien

Check Part 1B item(s) being responded to:

☑ 2D

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

● You and one or more of your *advisory affiliates* or *management persons*

○ One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	1031460	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	GOLDSTEIN, PHILIP, ALAN (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Judgment/Lien Amount:
   $ 66,314.02

2. Judgment/Lien Holder:
   IRS

3. Judgment/Lien Type:
   Tax

4. Date Filed (MM/DD/YYYY):
   10/15/2024 ● Exact ○ Explanation
   If not exact, provide explanation:
   DID NOT LEARN ABOUT LIEN UNTIL 12/20/2024

5. Is Judgment/Lien outstanding? ● Yes ○ No
   If No, provide status date (MM/DD/YYYY):
   ○ Exact ○ Explanation
   If not exact, provide explanation:

   If No, how was matter resolved?

6. Court (Name of Federal, State or Foreign Court), Location of Court (City or County and State or Country) and Docket/Case Number:
   LACKAWANNA COUNTY COURT OF COMMON PLEAS OF THE 45TH JUDICIAL DISTRICT OF THE COMMONWEALTH OF PENNSYLVANIA CITY OF SCRANTON, LACKAWANNA COUNTY, COMMONWEALTH OF PENNSYLVANIA, UNITED STATES OF AMERICA 2024-CV-6992

7. Provide a brief summary of events leading to the action and any payment schedule details including current status (if applicable) (your response must fit within the space provided):
   THIS IS A RE-FILING OF A PRIOR LIEN AND RECORDED UNDER A NEW DOCKET NUMBER. THERE IS NO FORMAL INSTALL AGREEMENT ON FILE, HOWEVER MAKING VOLUNTARILY PAYMENTS MONTHLY TOWARDS THIS OUTSTANDING AMOUNT. AM CURRENTLY WORKING WITH AN ENROLLED AGENT IN AN ATTEMPT TO SETTLE THIS DEBT UNDER THE IRS FRESH START PROGRAM.

This Disclosure Reporting Page (DRP ADV) is an ○ *INITIAL* ***OR*** ● *AMENDED* response used to report details for affirmative responses to Item 2.D. of Part 1B of Form ADV.

Judgment/Lien

Check Part 1B item(s) being responded to:

☑ 2D

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

   ○ You (the advisory firm)

   ○ You and one or more of your *advisory affiliates* or *management persons*

   ● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number: 1031460

This *advisory affiliate* or *management person* is ○ a Firm ● an Individual

Registered: ● Yes ○ No

Name: GOLDSTEIN, PHILIP, ALAN (For individuals, Last, First, Middle)

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Judgment/Lien Amount:
$ 83,370.76

2. Judgment/Lien Holder:
IRS

3. Judgment/Lien Type:
Tax

4. Date Filed (MM/DD/YYYY):
12/29/2023 ● Exact ○ Explanation
If not exact, provide explanation:

5. Is Judgment/Lien outstanding? ● Yes ○ No
If No, provide status date (MM/DD/YYYY):
○ Exact ○ Explanation
If not exact, provide explanation:

If No, how was matter resolved?

6. Court (Name of Federal, State or Foreign Court), Location of Court (City or County and State or Country) and Docket/Case Number:
LACKAWANNA COUNTY COURT OF COMMON PLEAS OF THE 45TH JUDICIAL DISTRICT OF THE COMMONWEALTH OF PENNSYLVANIA CITY OF SCRANTON, LACKAWANNA COUNTY, COMMONWEALTH OF PENNSYLVANIA, UNITED STATES OF AMERICA 2023-CV-5549

7. Provide a brief summary of events leading to the action and any payment schedule details including current status (if applicable) (your response must fit within the space provided):
THIS IS A RE-FILE OF AN EXISTING TAX LIEN THAT THE IRS DID PRIOR TO THE STATUE OF LIMITATION EXPIRATION. THIS LIEN WAS ORIGINALLY INCLUDED IN THE CHAPTER 13 BANKRUPTCY FILING. THE CHAPTER 13 BANKRUPTCY WAS COMPLETED AND DEBTS WERE DISCHARGED.

This Disclosure Reporting Page (DRP ADV) is an ○ *INITIAL* ***OR*** ● *AMENDED* response used to report details for affirmative responses to Item 2.D. of Part 1B of Form ADV.

Judgment/Lien

Check Part 1B item(s) being responded to:

☑ 2D

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	1031460	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	GOLDSTEIN, PHILIP, ALAN (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Judgment/Lien Amount:
$ 264,443.48

2. Judgment/Lien Holder:
USA

3. Judgment/Lien Type:
Civil

4. Date Filed (MM/DD/YYYY):
05/28/2013 ● Exact ○ Explanation
If not exact, provide explanation:

5. Is Judgment/Lien outstanding? ● Yes ○ No
If No, provide status date (MM/DD/YYYY):
○ Exact ○ Explanation
If not exact, provide explanation:

If No, how was matter resolved?

6. Court (Name of Federal, State or Foreign Court), Location of Court (City or County and State or Country) and Docket/Case Number:
LACKAWANNA COUNTY COURT OF COMMON PLEAS, 45TH JUDICIAL DISTRICT OF THE COMMONWEALTH OF PENNSYLVANIA CITY OF SCRANTON, LACKAWANNA COUNTY, COMMONWEALTH OF PENNSYLVANIA, UNITED STATES OF AMERICA 2013-CV-2715

7. Provide a brief summary of events leading to the action and any payment schedule details including current status (if applicable) (your response must fit within the space provided):
US FEDERAL GOVERNMENT SOUGHT TO HAVE THE FEDERAL JUDGMENT THAT WAS OBTAINED IN US DISTRICT COURT ON 11/21/12 TO ALSO BE RECORDED IN THE STATE COURT. JUDGMENT IS INCLUDED IN ADVIDSOR AFFILIATE CHAPTER 13 BANKRUPTCY PROCEEDING. HOWEVER, THE BANKRUPTCY MATTER WAS DISCHARGED. AWAITING FOR FORMAL NOTIFICATION FROM THE COURT WHERE THE JUDGMENT IS FILED TO HAVE THE JUDGMENT DISCHARGED AND REMOVED FROM THE THEIR RECORDS PURSUANT TO THE BANKRUPTCY COURT DISCHARGE ORDER

This Disclosure Reporting Page (DRP ADV) is an ○ *INITIAL* ***OR*** ● *AMENDED* response used to report details for affirmative responses to Item 2.D. of Part 1B of Form ADV.

Judgment/Lien

Check Part 1B item(s) being responded to:

☑ 2D

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	1031460	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	GOLDSTEIN, PHILIP, ALAN (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Judgment/Lien Amount:
$ 288,138.75

2. Judgment/Lien Holder:
USA

3. Judgment/Lien Type:
Civil

4. Date Filed (MM/DD/YYYY):
03/21/2013 ● Exact ○ Explanation
If not exact, provide explanation:

5. Is Judgment/Lien outstanding? ● Yes ○ No
If No, provide status date (MM/DD/YYYY):
○ Exact ○ Explanation
If not exact, provide explanation:

If No, how was matter resolved?

6. Court (Name of Federal, State or Foreign Court), Location of Court (City or County <u>and</u> State or Country) and Docket/Case Number:
LACKAWANNA COUNTY COURT OF COMMON PLEAS, 45TH JUDICIAL DISTRICT OF THE COMMONWEALTH OF PENNSYLVANIA CITY OF SCRANTON, LACKAWANNA COUNTY, COMMONWEALTH OF PENNSYLVANIA, UNITED STATES OF AMERICA 2013-CV-1321

7. Provide a brief summary of events leading to the action and any payment schedule details including current status (if applicable) (your response must fit within the space provided):
JUDGMENT IS JOINTLY WITH ADVISOR AFFILIATE AND HIS WIFE. THE US FEDERAL GOVERNMENT SOUGHT TO HAVE THE FEDERAL JUDGMENT THAT WAS OBTAINED IN US DISTRICT COURT ON 11/21/12 TO BE ALSO RECORDED IN THE STATE COURT. JUDGMENT IS INCLUDED IN ADVISOR AFFILIATE CHAPTER 13 BANKRUPTCY PROCEEDING. HOWEVER, THE BANKRUPTCY MATTER WAS DISCHARGED. AWAITING FOR FORMAL NOTIFICATION FROM THE COURT WHERE THE JUDGMENT IS FILED TO HAVE THE JUDGMENT DISCHARGED AND REMOVED FROM THE THEIR RECORDS PURSUANT TO THE BANKRUPTCY COURT DISCHARGE ORDER

This Disclosure Reporting Page (DRP ADV) is an ○ *INITIAL* ***OR*** ● *AMENDED* response used to report details for affirmative responses to Item 2.D. of Part 1B of Form ADV.

Judgment/Lien

Check Part 1B item(s) being responded to:

☑ 2D

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

○ You (the advisory firm)

○ You and one or more of your *advisory affiliates* or *management persons*

● One or more of your *advisory affiliates* or *management persons*

If this DRP is being filed for an *advisory affiliate* or a *management person*, give the full name of the *advisory affiliate* or *management person* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* or *management person* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate checkbox.

ADV DRP - *ADVISORY AFFILIATE* or *MANAGEMENT PERSON*

CRD Number:	1031460	This *advisory affiliate* or *management person* is ○ a Firm ● an Individual
Registered:	● Yes ○ No	
Name:	GOLDSTEIN, PHILIP, ALAN (For individuals, Last, First, Middle)	

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* or *management person(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

NOTE: The completion of this form does not relieve the *advisory affiliate* or *management person* of its obligation to update its IARD or *CRD* records.

PART II

1. Judgment/Lien Amount:
$ 552,502.23

2. Judgment/Lien Holder:
USA

3. Judgment/Lien Type:
Civil

4. Date Filed (MM/DD/YYYY):
11/21/2012 ● Exact ○ Explanation
If not exact, provide explanation:

5. Is Judgment/Lien outstanding? ● Yes ○ No
If No, provide status date (MM/DD/YYYY):
○ Exact ○ Explanation
If not exact, provide explanation:

If No, how was matter resolved?

6. Court (Name of Federal, State or Foreign Court), Location of Court (City or County <u>and</u> State or Country) and Docket/Case Number:
UNITED DISTRICT COURT MIDDLE DISTRICT FOR THE COMMONWEALTH OF PENNSYLVANIA CITY OF SCRANTON, LACKAWANNA COUNTY, COMMONWEALTH OF PENNSYLVANIA, UNITED STATES OF AMERICA 3-11-CV-2177

7. Provide a brief summary of events leading to the action and any payment schedule details including current status (if applicable) (your response must fit within the space provided):
$288,183.74 IS JOINTLY WITH ADVISOR AFFILIATE AND HIS WIFE; $264,443.48 AGAINST ADVISOR AFFILIATE ONLY. THE VARIOUS TAX LIENS BY THE IRS, WAS REDUCED TO A FEDERAL JUDGMENT. THE JUDGMENT WAS ALSO RECORDED IN THE LACKAWANNA COUNTY COURT OF COMMON PLEAS. JUDGMENT IS INCLUDED IN ADVISOR AFFILIATE CHAPTER 13 BANKRUPTCY PROCEEDING. HOWEVER, THE BANKRUPTCY MATTER WAS DISCHARGED. AWAITING FOR FORMAL NOTIFICATION FROM THE COURT WHERE THE JUDGMENT IS RECORDED TO HAVE THE JUDGMENT DISCHARGED AND REMOVED FROM THE THEIR RECORDS PURSUANT TO THE BANKRUPTCY COURT DISCHARGE ORDER

Part 1B Item 1 - State Registration

You must complete this Part 1B only if you are applying for registration, or are registered, as an investment adviser with any of the *state securities authorities*.

Complete this Item 1 if you are submitting an initial application for state registration or requesting additional state registration(s). Check the boxes next to the states to which you are submitting this application. If you are already registered with at least one state and are applying for registration with an additional state or states, check the boxes next to the states in which you are applying for registration. Do not check the boxes next to the states in which you are currently registered or where you have an application for registration pending.

Jurisdictions

☐ AL
☐ AK
☐ AZ
☐ AR
☐ CA
☑ CO
☐ CT
☐ DE
☐ DC
☐ FL
☐ GA
☐ GU
☐ HI
☐ ID

☐ IL
☐ IN
☐ IA
☐ KS
☐ KY
☑ LA
☐ ME
☐ MD
☐ MA
☐ MI
☑ MN
☐ MS
☐ MO
☐ MT

☐ NE
☐ NV
☐ NH
☐ NJ
☐ NM
☐ NY
☐ NC
☐ ND
☐ OH
☐ OK
☐ OR
☑ PA
☐ PR
☐ RI

☐ SC
☐ SD
☐ TN
☑ TX
☐ UT
☐ VT
☐ VI
☐ VA
☐ WA
☐ WV
☐ WI
☐ WY

Part 1B Item 2 - Additional Information

Complete this Item 2A. only if the person responsible for supervision and compliance does not appear in Item 1J. or 1K. of Form ADV Part 1A:

A. Person responsible for supervision and compliance:

Name:
Title:
Telephone:
Fax:
Number and Street 1:
Number and Street 2:
City:
State:
Country:
ZIP+4/Postal Code:
Email address, if available:
If this address is a private residence, check this box: ☐

B. Bond/Capital Information, if required by your *home state*

(1) Name of Issuing Insurance Company:
LEXON INSURANCE COMPANY

(2) Amount of Bond:
$ 10000.00

(3) Bond Policy Number:
1136458

	Yes	No
(4) If required by your home state, are you in compliance with your home state's minimum capital requirements?	●	○

Part 1B - Disclosure Questions

BOND DISCLOSURE

For "yes" answers to the following question, complete a Bond DRP.	Yes	No
C. Has a bonding company ever denied, paid out on, or revoked a bond for you, any *advisory affiliate*, or any *management person*?	○	●

JUDGMENT/LIEN DISCLOSURE

For "yes" answers to the following question, complete a Judgment/Lien DRP.	Yes	No
D. Are there any unsatisfied judgments or liens against you, any *advisory affiliate*, or any *management person*?	●	○

ARBITRATION DISCLOSURE

For "yes" answers to the following questions, complete an Arbitration DRP.

E. Are you, any *advisory affiliate*, or any *management person* currently the subject of, or have you, any *advisory affiliate*, or any *management person* been the subject of, an arbitration claim alleging damages in excess of $2,500, involving any of the following:

	Yes	No
(1) any investment or an *investment-related* business or activity?	●	○
(2) fraud, false statement, or omission?	●	○
(3) theft, embezzlement, or other wrongful taking of property?	○	●
(4) bribery, forgery, counterfeiting, or extortion?	○	●
(5) dishonest, unfair, or unethical practices?	●	○

CIVIL JUDICIAL DISCLOSURE

For "yes" answers to the following questions, complete a Civil Judicial Action DRP.

F. Are you, any *advisory affiliate*, or any *management person* currently subject to, or have you, any *advisory affiliate*, or any *management person* been *found* liable in, a civil, *self-regulatory organization*, or administrative *proceeding* involving any of the following:

	Yes	No
(1) an investment or *investment-related* business or activity?	○	●
(2) fraud, false statement, or omission?	○	●
(3) theft, embezzlement, or other wrongful taking of property?	○	●
(4) bribery, forgery, counterfeiting, or extortion?	○	●
(5) dishonest, unfair, or unethical practices?	○	●

Part 1B - Business Information

G. Other Business Activities

(1) Are you, any *advisory affiliate*, or any *management person* actively engaged in business as a(n) (check all that apply):

- ☑ Tax Preparer
- ☐ Issuer of securities
- ☐ Sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- ☐ Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles
- ☐ Real estate adviser

(2) If you, any *advisory affiliate*, or any *management person* are actively engaged in any business other than those listed in Item 6.A of Part 1A or Item 2.G(1) of Part 1B, describe the business and the approximate amount of time spent on that business:

FIXED ANNUITIES AND LIFE, ACCIDENT & HEALTH, AND LONG TERM CARE INSURANCE. NOTARY SERVICES, CONSULTING ON COLLEGE PLANNING ON HOW TO GET FINANCIAL AID AND CONSULTING ON HOW TO MAXIMIZE SOCIAL SECURITY BENEFITS. ADVISORY AFFILIATE IS AFFILIATED WITH ANOTHER ADVISORY FIRM. ALL OF THESE ACTIVITIES ARE DONE DURING NORMAL BUSINESS HOURS.

H. If you provide financial planning services, the investments made based on those services at the end of your last fiscal year totaled:

	Securities Investments	Non-Securities Investments
Under $100,000	●	●
$100,001 to $500,000	○	○
$500,001 to $1,000,000	○	○
$1,000,001 to $2,500,000	○	○
$2,500,001 to $5,000,000	○	○
More than $5,000,000	○	○

If securities investments are over $5,000,000, how much? (round to the nearest $1,000,000)

If non-securities investments are over $5,000,000, how much? (round to the nearest $1,000,000)

I. *Custody*

	Yes	No
(1) Advisory Fees		
Do you withdraw advisory fees directly from your *clients'* accounts? If you answered "yes", respond to the following:	●	○
(a) Do you send a copy of your invoice to the custodian or trustee at the same time that you send a copy to the *client*?	●	○
(b) Does the custodian send quarterly statements to your *clients* showing all disbursements for the custodian account, including the amount of the advisory fees?	●	○
(c) Do your *clients* provide written authorization permitting you to be paid directly for their accounts held by the custodian or trustee?	●	○
(2) Pooled Investment Vehicles and Trusts		
(a) (i) Do you or a *related person* act as a general partner, managing member, or person serving in a similar capacity, for any pooled investment vehicle for which you are the adviser to the pooled investment vehicle, or for which you are the adviser to one or more of the investors in the pooled investment vehicle? If you answered "yes", respond to the following:	○	●
(a) (ii) As the general partner, managing member, or person serving in a similar capacity, have you or a *related person* engaged any of the following to provide authority permitting each direct payment or any transfer of funds or securities from the account of the pooled investment vehicle?		

Attorney ○ ●

Independent certified public accountant ○ ●

Other independent party ○ ●

Describe the independent party:

For purposes of this Item 2I.2(a), "Independent party" means a person that: (A) is engaged by the investment adviser to act as a gatekeeper for the payment of fees, expenses and capital withdrawals from the pooled investment; (B) does not control and is not controlled by and is not under common control with the investment adviser; (C) does not have, and has not had within the past two years, a material business relationship with the investment adviser; and (D) shall not negotiate or agree to have material business relations or commonly controlled relations with an investment adviser for a period of two years after serving as the person engaged in an independent party agreement.

(b) Do you or a *related person* act as investment adviser and a trustee for any trust, or act as a trustee for any trust in which your advisory clients are beneficiaries of the trust? ○ ●

(3) Do you require the prepayment of fees of more than $500 per *client* and for six months or more in advance? ○ ●

J. If you are organized as a sole proprietorship, please answer the following: **Yes No**

(1) (a) Have you passed, on or after January 1, 2000, the Series 65 examination? ○ ○

(b) Have you passed, on or after January 1, 2000, the Series 66 examination and also passed, at any time, the Series 7 examination? ○ ○

(2) (a) Do you have any investment advisory professional designations? ○ ○

If "no",you do not need to answer Item 2.J(2)(b).

(b) I have earned and I am in good standing with the organization that issued the following credential:

- ☐ Certified Financial Planner ("CFP")
- ☐ Chartered Financial Analyst ("CFA")
- ☐ Chartered Financial Consultant ("ChFC")
- ☐ Chartered Investment Counselor ("CIC")
- ☐ Personal Financial Specialist ("PFS")
- ☐ None of the above

(3) Your Social Security Number:

K. If you are organized other than as a sole proprietorship, please provide the following:

(1) Indicate the date you obtained your legal status. Date of formation: 04/14/2016

(2) Indicate your IRS Empl. Ident. No.:

Part 2

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)
249913	FORM ADV PART 2A	Individuals, High net worth individuals, Financial Planning Services, Selection of Other Advisers/Solicitors
258860	FORM ADV PART 2B SUPPLEMENT FOR HEATH GOLDSTEIN	The document is a Brochure Supplement for one or more supervised persons (state-registered advisers only)

Execution Pages

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your *principal office and place of business* and any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are submitting a *notice filing*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:
HEATH GOLDSTEIN

Date: MM/DD/YYYY
07/21/2026

Printed Name:
HEATH GOLDSTEIN

Title:
VICE-PRESIDENT

Adviser *CRD* Number:
283072

NON-RESIDENT **INVESTMENT ADVISER EXECUTION PAGE**

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding* or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of any state in which you are submitting a *notice filing*.

2. Appointment and Consent: Effect on Partnerships

If you are organized as a partnership, this irrevocable power of attorney and consent to service of process will continue in effect if any partner withdraws from or is admitted to the partnership, provided that the admission or withdrawal does not create a new partnership. If the partnership dissolves, this irrevocable power of attorney and consent shall be in effect for any action brought against you or any of your former partners.

3. *Non-Resident* Investment Adviser Undertaking Regarding Books and Records

By signing this Form ADV, you also agree to provide, at your own expense, to the U.S. Securities and Exchange Commission at its principal office in Washington D.C., at any Regional or District Office of the Commission, or at any one of its offices in the United States, as specified by the Commission, correct, current, and complete copies of any or all records that you are required to maintain under Rule 204-2 under the Investment Advisers Act of 1940. This undertaking shall be binding upon you, your heirs, successors and assigns, and any *person* subject to your written irrevocable consents or powers of attorney or any of your general partners and *managing agents*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:

Date: MM/DD/YYYY

Printed Name:

Title:

Adviser *CRD* Number:
283072

STATE-REGISTERED INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial application for state registration and all amendments to registration.

1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the legally designated officers and their successors, of the state in which you maintain your *principal office and place of business* and any other state in which you are applying for registration or amending your registration, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is founded, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are applying for registration or amending your registration.

2. State-Registered Investment Adviser Affidavit

If you are subject to state regulation, by signing this Form ADV, you represent that, you are in compliance with the registration requirements of the state in which you maintain your principal place of business and are in compliance with the bonding, capital, and recordkeeping requirements of that state.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Date: MM/DD/YYYY 07/21/2026	Printed Name: HEATH GOLDSTEIN
Adviser *CRD* Number: 283072	
Signature: HEATH GOLDSTEIN	Title: VICE-PRESIDENT